

0AR-17-000-5604
P1
LIBERTY OIL & GAS CORPORATION

GARY L. HILL
Vice-President
P.O. Box 215
Marietta, Ohio 45750
•
OFFICE AND YARD
Phone 740-374-5383
•
TELECOPIER NO.
740-374-3427

RECEIVED JAN 5 / 2017

PETER A. MORSE, SR.
President
P.O. Box 542
Olney, Illinois 62450
•
OFFICE
Phone 618-395-4405
•
TELECOPIER NO.
618-395-3207

December 22, 2016

***Via Email Transmittal
And First Class Mail***

Attn: Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park NC 27709

Re: Information Collection Request

Dear Ms. Shine:

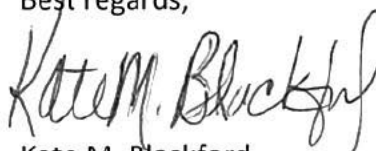
We are in receipt of your letter dated November 14, 2016, which was received in our office on Tuesday, December 6, 2016.

The letter states that the Part 1 survey must be completed within 60 days of receipt of the letter. The information requested is quite complex and will require time to complete. Currently we are faced with business specific end of year obligations, together with a number of required Federal and State filings in the first quarter of 2017. (b) (4)

Based on the 60-day requirement, our information is due February 6, 2017. We respectfully request an extension of sixty (60) days with our new submission date being April 6, 2017.

Following your review of this letter, please advise if our requested extension has been granted.

Best regards,



Kate M. Blackford
Vice-President

LIBERTY OIL & GAS CORPORATION

P.O. Box 542
Olney, Illinois 62450

LIBERTY OIL & GAS CORPORATION
P.O. Box 542
OLNEY, ILLINOIS 62450
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Attn: Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park NC 27709

27709-031059





Texas Petroleum Investment Company

January 9, 2017

Ms Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail code: E143-01
Research Triangle Park, NC 27709

012-17-000-4244
P1
12
RECEIVED JAN 11 2017

Sent via Federal Express, Return Receipt Requested
Tracking No. 788137070402

Re: Section 114 ICR Extension Request
Facility ID: 1656200

Dear Ms. Shine:

Texas Petroleum Investment Company respectfully requests a (60) day extension to
reply to the Section 114 ICR letter. (b) (4)

(b) (4)

(b) (4) we request a 60 day extension of response time for the following reasons:

1. The request is being made concurrent with other federal and state reporting requirements. (i.e.: Subpart W reporting, Title V reporting, NSPS OOOO/OOOOa reporting, state emissions inventory reporting, Tier II reporting, and others.)
2. Difficulty in obtaining such a vast amount of information in such a short amount of time. ICR is requesting data for 2500 plus wells covering 4 states.
3. (b) (4)
(b) (4)

Your timely response and approval of this request is appreciated.

If you have any questions or comments, I can be reached at (830) 875-9804 or by email at mdozier@txpetinv.com.

Sincerely,

Mark Dozier
Environmental Manager
Texas Petroleum Investment Company
7593 FM 671
Luling, Texas 78648
Office 830-875-9804
mdozier@txpetinv.com

md
cc

EPA ICR File

<p>ORIGIN ID: NIRA (830) 875-9800 MARK DOZIER 1PC 7593 FM 671 LULING, TX 78648 UNITED STATES US</p>	<p>SHIP DATE: 10JAN17 ACTWGT: 1.00 LB CAD: 107743638IN/ET3790 BILL SENDER</p>
<p>TO: MS. BRENDA SHINE U.S. ENVIRONMENTAL PROTECTION AGENC 109 T.W. ALEXANDER DRIVE MAIL CODE: 143-01 RESEARCH NC 27709</p>	
<p>PO: (888) 372-8696 NV DEPT</p>	<p>544J1/1997/14EB</p>

<p>TRK# 7781 3707 0242 [0201] XH MXEA NC-US RDU 27709</p>	<p>WED - 11 JAN 10:30A PRIORITY OVERNIGHT DSR</p>
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FROM:

MARK DOZIER

TEXAS PETROLEUM INVESTMENT CO.
7593 FM 671
LULING, TX 78648

TO:

ATTN: MS. BRENDA SHINE

U.S. EPA

109 T.W. ALEXANDER DRIVE

MAIL CODE: E143-01

RESEARCH TRIANGLE PARK, NC
27709

WACO OIL & GAS CO., INC.

1595 US HWY 33 E

Post Office Box 397

Glenville, West Virginia 26351

EAR-17-000-4245

P1

Phone: (304) 462-5741

Fax: (304) 462-8670

20

RECEIVED JAN 10 2017

US Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T. W. Alexander Dr. Mail Code: E 143-01
Research Triangle Park, NC 27709

Re: Information Collection Request

January 3, 2017

Dear Ms. Shine:

how much time

We are in receipt of the Information Collection Request dated November 14, 2016 and I have attached a copy hereto for reference.

Due to multiple end of year filings, coupled with (b)(4)
(b) (4) we find it necessary to request an extension of the time to complete this request.

Therefore, by this writing, we hereby officially request an extension of the filing timeline for the required information.

We thank you for your consideration of this matter and look forward to your response.

Sincerely,
Waco Oil & Gas Co., Inc.

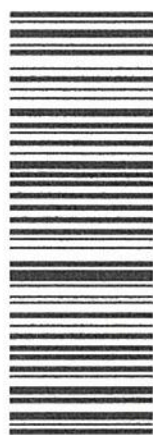
D S Morris

Douglas S. Morris
Vice President

Waco OIL AND GAS COMPANY, INC.

P.O. Box 397
Glenville, West Virginia 26351

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US Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T. W. Alexander Dr. Mail Code: E 143-01
Research Triangle Park, NC 27709

2770980310 R777



0AR-17-000-4246

PI

ANDERSON PRODUCTION

P O BOX 710

CISCO, TEXAS 76437

*Called &
left a message
11/10/17 JH*

Mr. Peter Tsirigotis

Director, Sector Policies and Program Division

Office of Air Quality Planning and Standards

United States Environmental Protection Agency

109 T.W. Alexander Drive

Research Triangle Park, NC 27709

RE: REQUEST FOR EXTENSION OF TIME TO FILE OIL AND NATURAL GAS SECTOR ICR

Primary Facility ID# 1024800 through 1024820 for Anderson Production

Dear Mr. Tsirigotis:

On 12-9-2016 my company, Anderson Production, received a letter from you dated 11-14-2016, requesting extensive information regarding the above referenced facilities. For the following reasons I respectfully request an extension of 60 days to respond to the information collection request.

(b) (4)

(b) (4)

Also time consuming is going to each individual well site over such a large area to collect necessary data. As you know, I have to certify as to the accuracy of this information, so it is imperative that I go slow and get it right. In addition to limited staff and time this request falls over the Holiday Season, the end of the year, and at a time when all other yearly government requests are due, i.e. IRS form 941, IRS form 940, state production reports, state compliance reports, state unemployment reports, employee W2s, royalty owner 1099s, income tax preparation of data for annual filing of federal taxes, etc. It is also unclear when exactly this request is due because of the various Holidays during this time period and I would request a clarification as to when EPA considers the

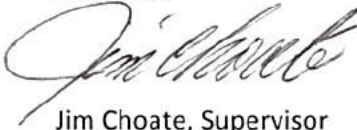
response due .

(b) (4)

In the event that you do not grant an extension and I am unable to fully complete the request, what are my options? Do I send in what I have completed and exclude the rest and ask for an extension on only those or send in an incomplete survey? I want to comply, but with limited time and resources it is virtually impossible, time wise, to get this completed by the due date.

I appreciate your consideration and will be glad to answer any questions you may have regarding this request. I look forward to hearing from you regarding my concerns.

Sincerely,


Jim Choate, Supervisor

1-5-17

Anderson Production

cell #(b) (6)

Office (254) 442-2525 24 hour answering machine

cc: Ms. Brenda Shine



1000



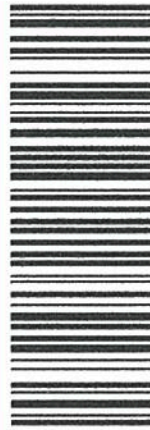
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ANDERSON PRODUCTION
P.O. BOX 710
CISCO, TX 76437

RECEIVED JAN 10 2017

Ms. Brenda Shing
U.S. Environmental Protection Agency
109 T.W. Alexander Drive
MAIL CODE E143-01
Research Triangle Park, N.C. 27709

2770980310 R777



OPR-17-000-4247

P1

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December 27, 2016

RECEIVED JAN 10 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Dear Ms. Shine:

This letter is responsive to three separate letters that H.L. Brown Operating, LLC ("H.L. Brown") recently received from the Environmental Protection Agency ("EPA") requesting that H.L. Brown responds to an Information Collection Request ("ICR"). Each of the letters indicates that EPA is seeking information under authority granted to the Administrator in Section 114 of the Clean Air Act, 42 U.S.C. § 7414. Each letter directs H.L. Brown to "complete the ICR as described in this letter for each of your crude petroleum and natural gas extraction facilities." H.L. Brown received the first of these letters on December 8, 2016 and the remaining two letters on December 13, 2016.

As a preliminary matter, the fact that EPA has sent three letters creates uncertainty regarding which facilities EPA is seeking information about in each letter. Each of the letters is addressed to the same entity – H.L. Brown Operating, LLC – yet each letter references a different Facility ID: 1277750, 1090900, and 1277700. Given that each letter directs H.L. Brown "to complete the Part I (operator) survey for all oil and gas production well surface sites and centralized production surface sites that [H.L. Brown] operates," it is unclear how the requests in each letter are different and whether H.L. Brown must respond separately to each letter. H.L. Brown requests that EPA more expressly define the scope of information EPA is seeking under each letter H.L. Brown received and clarify whether EPA expects H.L. Brown to make three separate responses to these letters.

Even taken individually, responding to the ICRs in the timeframe EPA requires will place an unreasonable burden on H.L. Brown. As numerous commenters observed during the public comment period related to the ICR, EPA's initiative requires that operators provide an unprecedented amount of detailed information on an extraordinarily broad scope of topics. Because providing the information responsive to each of the requests EPA has issued within the timeframe EPA contemplates (b) (4)

(b) (4)

(b) (4) H.L. Brown respectfully requests a sixty-day extension for H.L. Brown to submit its responses to the Part I survey. (b) (4)

H.L. Brown is a small, privately held company that operates approximately 80 wells in west Texas and southeast New Mexico. (b) (4)

(b) (4)

(b) (4) At best, responding within the limited timeframe EPA contemplates is likely to require H.L. Brown to retain paid outside consultants. By granting this reasonable extension and allowing 120 days to respond to the Part I survey, EPA will be giving company H.L. Brown much-needed time to adequately respond to the ICR and will ensure that the information provided is accurate, thorough, and responsive to the ICR.

H.L. Brown remains committed to working collaboratively with EPA to provide the information EPA seeks under EPA's Section 114 authority. Thank you in advance for your consideration of this request.

Sincerely,

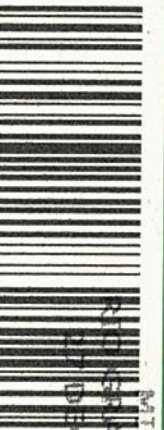
A handwritten signature in blue ink that reads "Carlton Wheeler". The signature is written in a cursive, slightly slanted style.

Carlton Wheeler
H.L. Brown Operating, LLC
Operations Manger

H. L. BROWN OPERATING, L.L.C.

P. O. BOX 2237
MIDLAND, TEXAS
79702-2237

CERTIFIED MAIL



7014 3490 0000 0966 2423

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. N.W.
Washington, DC 20460



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P1

5



CIRCLE H OIL COMPANY INC.

Mailing: 2401 Baylor Blvd. Big Spring, TX. 79720
Phone: (432)517-0784 or (432)393-5305

January 5, 2017

RECEIVED JAN 10 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID (1130450) - See Attached list of wells and leases

Dear Mr. Tsirigotis:

On December 8, 2016, my company, Circle H Oil Company, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR")¹.

(b) (4)

(b) (4)

(b) (4) Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III, monthly RRC production reporting, monthly comptroller reporting, year-end tax obligations and day to day activities of the business. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

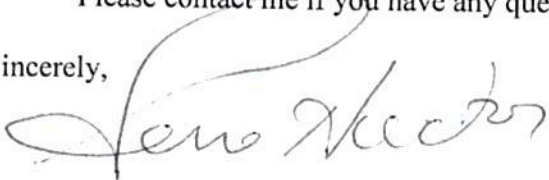
Mr. Peter Tsirigotis
January 5, 2017
Page 2

In addition to requesting additional time, the various aspects of the Part 1 Survey [*or Part 2 Survey*] are unclear to me.

- *Whose responsibility is it to respond when I have limited office staff?*
- *Whose responsibility is it to respond if the leases are owned by multiple operators?*
- *What should we use for surface site ID if a tank does not have a permit or ID number as we don't have the time or staff to generate identification codes?*
- *What is an acceptable calculation for TPY as identified in 40 CFR 60.5397a?*
- *Additionally, what would the EPA deem a reasonable assumption to calculate the above?*
- *Can a consultant register and file the applicable documents for the operator?*
- *Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?]*
- *What should I do if my Basin ID or geographic area is not listed?*
- *All of my wells are stripper wells, why is the EPA interested in these low volume wells and imposing an economic hardship to fill out this survey?*

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gene Hector".

Gene Hector - President

cc: Ms. Brenda Shine



Oil & Gas Data Query

Query Menu [Help](#)

Wellbore Query Results

Search Criteria:									
Operator(s): CIRCLE H OIL COMPANY									
Schedule Type: Current									
Return									
57 results									
Page: 1 of 1									
Page Size: View All									
API No.	District	Lease No.	Lease Name	Well No.	Field Name	Operator Name	County	On Schedule	API Depth
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22732900 Links	08	47987 Links	JOHN B. BOWEN, JR. "A"	4	HOWARD GLASSCOCK (CONSOLIDATED)	CIRCLE H OIL COMPANY	HOWARD	Y	2972
22732911 Links	08	47987 Links	JOHN B. BOWEN, JR. "A"	5	HOWARD GLASSCOCK (CONSOLIDATED)	CIRCLE H OIL COMPANY	HOWARD	Y	3100
22732912 Links	08	47987 Links	JOHN B. BOWEN, JR. "A"	6	HOWARD GLASSCOCK (CONSOLIDATED)	CIRCLE H OIL COMPANY	HOWARD	Y	3025
22732903 Links	08	47987 Links	JOHN B. BOWEN, JR. "A"	7	HOWARD GLASSCOCK (CONSOLIDATED)	CIRCLE H OIL COMPANY	HOWARD	Y	3060
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						CIRCLE H OIL COMPANY			
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22733960 <input type="button" value="Links"/>	08	30320 <input type="button" value="Links"/>	QUINN -H-	2	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3362
22733990 <input type="button" value="Links"/>	08	30320 <input type="button" value="Links"/>	QUINN -H-	4	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3335
22734059 <input type="button" value="Links"/>	08	31067 <input type="button" value="Links"/>	QUINN -HH-	5	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3350
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22734313 <input type="button" value="Links"/>	08	31903 <input type="button" value="Links"/>	SAUNDERS -B-	3	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3300
22731708 <input type="button" value="Links"/>	08	25266 <input type="button" value="Links"/>	WILKINSON	1	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3240
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22732415 <input type="button" value="Links"/>	08	25266 <input type="button" value="Links"/>	WILKINSON	1B	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3282
22732668 <input type="button" value="Links"/>	08	25266 <input type="button" value="Links"/>	WILKINSON	1C	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3269
22731895 <input type="button" value="Links"/>	08	25266 <input type="button" value="Links"/>	WILKINSON	2	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3270
22732246 <input type="button" value="Links"/>	08	25266 <input type="button" value="Links"/>	WILKINSON	2A	MOORE	CIRCLE H OIL COMPANY	HOWARD	Y	3250
<input type="button" value="Download"/>									<input type="button" value="Return"/>

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Circle H Oil Company, Inc.
2401 Baylor Blvd.
Big Spring, TX. 79720

AUSTIN
TX 787
07 JAN '13
PM 3 L



Attn: Ms. Brenda Shine
U.S. E.P.A.
109 T.W. Alexander Dr., Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



ORIGIN ID: ABIA (432) 393-5305
GENE HECTOR
CIRCLE H OIL COMPANY INC.
2401 BAYLOR BLVD

BIG SPRING, TX 79720
UNITED STATES US

SHIP DATE: 06 JAN 17
ACTWGT: 1.00 LB
CAD: 104344553/NET3790

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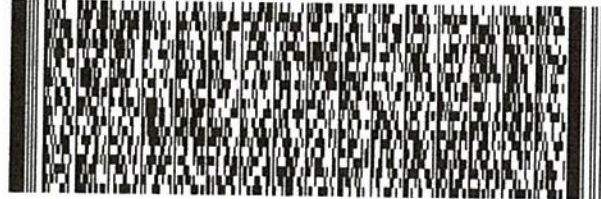
TO **BRENDA SHINE**
U.S. ENVIRO. PROTECTION AGENCY
109 T. W. ALEXANDER DRIVE

RESEARCH TRIANGLE PA NC 27709

(919) 541-3608
INV.
PO:

REF:

DEPT:



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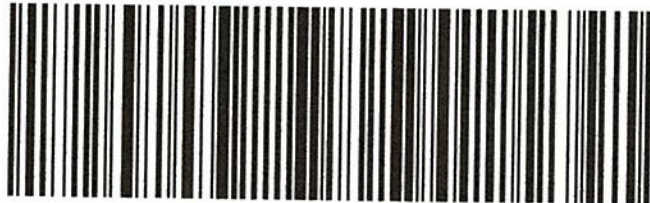
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1/6/2017

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OAR-17-000-4286 P1
BRECK OPERATING CORP.
P.O. BOX 911
BRECKENRIDGE, TEXAS 76424-0911
254-559-3355

January 3, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 12 2017

Ms. Shine,

In response to the Information Collection Request on oil and gas facilities that fall under the Clean Air Act, Breck Operating Corporation is hereby requesting an extension of one-hundred and eighty (180) days from the date of this letter, to provide the information requested in Part 1. (b) (4) and in order to provide accurate information, we feel it is necessary to request an extension. We have reviewed the well list for Part 2, and do not currently operate any wells on that list.

I am responding to this letter for the **Primary Facility ID: 1084250**. The following primary facility ID's were also sent to us, as related parties, and will be responded to with the above mentioned ID number:

1084200
1507650
1507600

Thank you,



Matthew J. Thompson
Vice President of Engineering





BRECK OPERATING CORP.

P.O. BOX 911 BRECKENRIDGE, TEXAS 76424-0911



Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



DATE-17-000-4288

21

Kebo Oil & Gas, Inc.

607 Railroad Avenue

Portland, Texas 78374

361-643-8821

January 10th, 2017

RECEIVED JAN 13 2017

Attn: Ms. Brenda Shine

U.S. Environmental Protection Agency

109 T.W. Alexander Drive, Mail Code: E143-01

Research Triangle Park, NC 27709

Dear Ms. Shine,

About a month ago we received a letter from Peter Tsirigotis asking that we complete a survey for the EPA of our production facilities. This letter serves to request an extension beyond the required 60 day deadline. We received the letter December 12th, 2016. We request that the deadline to respond be extended for at least another 90 days beyond the 60 day deadline for the following reasons.

1.

(b) (4)

2.

(b) (4)

Hopefully you will grant us the extension we have requested to complete the survey. We will do the survey to the best of our ability, but if forced to rush, we will have to rely on methods to complete the survey that may compromise its accuracy.

Sincerely,



Ken Boester, President

January 5, 2017

P1

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 13 2017

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1262950

Dear Mr. Tsirigotis:

On December 12, 2016, my company, Goldston Oil Corporation, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

Much of the information is not readily available and will require either a contractor or one of my employees to visit each site. In addition to limited/reduced staff, the ICR falls over the Holiday Season when many of the limited staff are off. Furthermore, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions and Tier II reporting being due within the same timeframe. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey and Part 2 Survey are unclear to me. I am still complying by list of questions for the Part 2 Survey, and will send those questions when finished to hopefully receive some clarification. Below are my questions on Part 1:

- Is the "Unique Surface Site ID" asked for in Sections 3 the same as the Facility ID provided in the November 14, 2016, letter?
- Is the "Surface Site Name/Description" asked for in Sections 3 the commonly used name of the facility that Goldston Oil Corporation uses for that facility?

Mr. Peter Tsirigotis

January 5, 2017

Page 2

Please contact me if you have any questions and I look forward to hearing from you.

Thank you,

A handwritten signature in blue ink, appearing to read "Rodney Henckel", is written over a horizontal line.

Rodney Henckel / Executive Vice President

cc: Ms. Brenda Shine

PO. BOX 570365
HOUSTON, TEXAS 77257-0365
RETURN SERVICE REQUESTED

Mr. Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

OAR-17-000-4291

P1

Hamman Oil & Refining Company

January 4, 2017

RECEIVED JAN 13 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

**RE: Request for Extension of Time to respond to the Oil and Natural Gas Sector ICR
Facility ID 1283150**

Dear Mr. Tsirigotis:

On December 12, 2016, Hamman Oil & Refining Company received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facilities. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

Much of the information is not readily available and could require me to personally visit each site. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

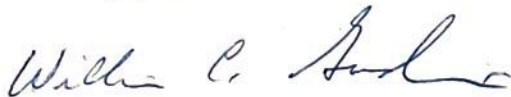
With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me.

- *Whose responsibility is it to respond when there is more than one owner?*
- *Whose responsibility is it to respond when the operator is different than the owner?*
- *All of our gas/oil is "produced" for "sales". These questions in Section 3 and 4 do not make sense to me? When would the answer to these questions be "no"?*
- *I have tanks on site that we commonly refer to as "gun barrels". I do not consider them "separators" but they do separate some oil/gas from water. How does the EPA view this equipment?*
- *Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016 letter?*

Please contact me at (713) 526-7417 ext 101 or email at bgoodwin@hammanoil.com if you have any questions. I look forward to hearing from you.

Sincerely yours,



William C. Goodwin
Engineering Manager



Hamman Oil & Refining Company

Post Office Box 130028 Houston, Texas 77219 713-526-7417

HOUSTON

TX 77003

JAN 04 2017

PM 11



UNITED STATES POSTAGE
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0001876396 JAN 04 2017
MAILED FROM ZIP CODE 77098

D205-1

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099





OAL-17-000-4294 P1

DELTA OIL & GAS LTD.

P.O. BOX 387 - PHONE: 254/559-9841
BRECKENRIDGE, TEXAS 76424-0387

January 6, 2017

RECEIVED JAN 13 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1179050 Delta Oil & Gas Company

Dear Mr. Tsirigotis:

On December 9, 2016, my company, Delta Oil & Gas Company, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR")¹.

(b) (4)

(b) (4)

(b) (4) Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me.

- Whose responsibility is it to respond when there is more than one owner?
- Whose responsibility is it to respond when the operator is different than the owner?

Mr. Peter Tsirigotis

January 6, 2017

Page 2

- All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?
- I have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. How does EPA view this equipment?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,



Nancy Landon
Delta Oil & Gas Ltd.
Vice President

cc: Ms. Brenda Shine



DELTA OIL & GAS Ltd.
P.O. BOX 387
BRECKENRIDGE, TEXAS 76424-0387

X

ENTERED MAIL



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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

2770980G10 R777



Killam Oil Co., Ltd.

OPR-17-000-4356

P1

4320 University Blvd.
P.O. Box 499
Laredo, Texas 78042

Phone 956.724-7141
Fax 956.724-2005
E-mail smarshall@killamco.com

January 10, 2017

VIA CERTIFIED MAIL

7015 0640 0001 6047 8315

RECEIVED JAN 17 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1360300, Killam Oil Co., Ltd ("Killam")

Dear Mr. Tsirigotis:

On December 9, 2016, Killam Oil Co., Ltd ("Killam"), received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, Killam respectfully requests **an extension of 60 days to respond to the information collection request ("ICR")**¹.


(b) (4)

(b) (4)

(b) (4) Much of the information is not readily available and will require staff to personally visit each site. As you know, this information collection requires Killam to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects Killam to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff were on vacation. Additionally, it is unclear to Killam, how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

Please contact me if you have any questions and I look forward to hearing from you concerning our request for additional time to respond. Please include Sara Narvaez snarvaez@killamco.com on any email response to this letter.

Sincerely,

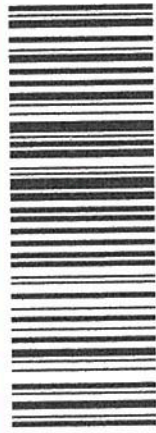

Stephen J. Marshall
Land Manager

cc: Ms. Brenda Shine

Killam Oil Co., LTD.
P.O. Box 499
Laredo, Texas 78042-0499

7

CERTIFIED MAIL®



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UNITED STATES POSTAGE
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MAILED FROM ZIP CODE 7804



MS. BRENDA SHIME
OFFICE OF AIR QUALITY PLANNING & STANDARDS
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
109 T.W. ALEXANDER DRIVE
RESEARCH TRIANGLE PARK, NC 27709

2770900310 R777





Samson Plaza
Two West Second Street
Tulsa, Oklahoma 74103-3103
918/591-1791

OPR-17-000-4357
P1

RECEIVED JAN 17 2017

January 11, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: **Facility ID 1582400**
Samson Investment Company
Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Part 1

Dear Mr. Tsirigotis:

On December 9, 2016, Samson Investment Company ("Samson") received the ICR regarding the above referenced Facility. In order to comply with an accurate response Samson respectfully requests an extension of 60 days to respond to Part 1.

(b) (4)

Please contact Lisa Vasicek at 918-591-1374 if you have any questions regarding Samson's request.

Sincerely,

Matthew Phillips
General Manager - Operations

cc: Ms. Brenda Shine
US Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC, 27709



8528 North Frontage Road
Bridgeport, IL 62417
Phone: 618-943-8700
Fax: 618-943-4501

OAR-17-002-4358

P1

1-13-17

RE: Request for an extension for Facility ID 1116900
for Section 114 of the Clean Air Act reporting.

RECEIVED JAN 17 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Ms. Shine,

CDG Operations respectfully requests an extension per the reporting requirements of the ICR. While we understand the importance of having accurate information, we feel unable to meet the very short timeline dictated by the ICR. CDG Operations only recently acquired its assets in and has only controlled operations since August of 2016. (b) (4)

(b) (4)

(b) (4) We are therefore formally requesting a 60 day extension to the filing deadline. We greatly appreciate your consideration and understanding regarding this matter and look forward to your response. Please contact Kyle Kingston at 618-943-8700 or by email at kkingston@cdgops.com if you have any questions or require further detail.

Respectfully

Alan Saunders
VP, Illinois Basin Operations

0AR-17-000-4359 p1



OIL & GAS CORPORATION

RECEIVED JAN 17 2017

January 10, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1707350

Dear Mr. Tsirigotis:

On December 10, 2016 my company, WCS Oil & Gas Corporation, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

We operate about 100 wells spread out over Lee, Fayette, Washington, Burleson, Brazos, Robertson, Dimmit and Zavala Counties, Texas. Some of our well locations are hundreds of miles away from our central office in Giddings, Texas (Lee County, Texas). Much of the requested information is not readily available and will probably require myself or my partner to personally visit each wellsite, as this is not a task I can delegate to someone else unless we are forced to hire a professional consultant (like an engineering firm). If I or my partner have to certify this information that we provide to the EPA subject to criminal liability then we either have to do it ourselves or hire a professional that we know we can trust. I guess my first inclination would be that the EPA should hire their consultants and gather this information themselves if the EPA really wants to get accurate and reliable information.

Because we received this letter right in the middle of the holiday season, we are just now even focusing in on the enormity of this request. With our limited manpower and our plans to resume a small drilling program in a month or two, I am quite sure that we cannot get Part I done in time and need an extension. We haven't even looked to see if we have a Part II well or wells that have to be dealt with also. I have no idea what the Part II will require of us and how expensive that may be also.

Correspondence: P.O. Box 9159
4807 Lovers Lane • Third Floor • Dallas, Texas 75209
Dallas, Texas Office: (214) 357-9116
Fax: (214) 357-9142

Also, I have some initial questions:

- 1) Should we be answering these surveys for only wells that we operate? We own interests in many wells that we do not operate.
- 2) If our equipment is rented, such as a compressor, and not owned should it be included?
- 3) Don't understand question in Sections 3 and 4: does the surface site produce natural gas or oil for sale? What would be a reason for a no answer? Maybe flaring gas? But all oil we produce is for sale. However, skim oil is not sold by us. It is produced but then taken off by a saltwater hauler and later sold as skim oil at their disposal facility. How should this be treated?
- 4) Don't understand what the difference is between Surface Site ID and Facility ID? If there is a difference, where do I get the Surface Site ID number from?

Thank you for your time and consideration. Please grant us an extension and answer the above questions when you can.

Very truly yours,

WCS OIL & GAS CORPORATION

By



Bruce J. Stensrud,
Executive Vice President

BJS/lm

cc: ✓ Brenda Shine
U.S. EPA
109 T. W. Alexander Drive, Mail Code E143-01
Research Triangle Park, NC 27709



P.O. Box 9159 / Dallas, Texas 75209

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0004618256 JAN 10 2017
MAILED FROM ZIP CODE 75209

Brenda Shine
U.S. EPA
109 T. W. Alexander Drive, Mail Code E143-01
Research Triangle Park, NC 27709

27709-031099



0AR-17-000-4362

P1



RECEIVED JAN 18 2017

BBX Operating, LLC

3698 RR 620 South, Suite 113
Austin, Texas 78738

January 13, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

**RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID 1054100**

Dear Mr. Tsirigotis:

On December 9, 2016, BBX Operating, LLC, "BBX", received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, BBX respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4)

In order to respond to the ICR, BBX personnel are responsible for collecting information on 97 wells spread out over 7 counties in Texas. Much of the information is not readily available, may require updating as noted in the questions below and therefore will require personal visits to each site. Further, as you know, this information collection requires certification to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects the certifying individual to criminal liability. Finally, the ICR fell over the Holiday Season. Therefore, it is unclear how to calculate the deadline for the response due to the intervening Holidays. Please clarify when the EPA considers the response due with the 60 day exception requested.


In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, and Sara Title III. With the limited personnel, BBX must balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. BBX is working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear.

- *Whose responsibility is it to respond when there is more than one working interest owner in a well, a fact which is applicable to over 90% of the BBX wells?*
- *Whose responsibility is it to respond when the BBX is a contract operator who owns no direct interest in the well?*
- (b) (4)
- (b) (4)
- *BBX has applied for and received permits by rule for all facilities it operates from the Texas Commission of Environmental Quality. The applications for these permits required calculations of methane emissions based on the amount of production estimated at the time the permit was received. For the purposes of the ICR, is BBX required to recalculate the amount of methane emissions based on 2016 production levels which are substantially reduced from the time when the permits were originally filed?*
- *All hydrocarbons are "produced" for "sales." These questions in Sections 3 and 4 do not make sense. When would the answer to these questions be "no"?*
- *Does the EPA consider tanks commonly referred to as "gun barrels" as separators as they do allow for the mechanical separation of hydrocarbons from water?*
- *Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?*

Please contact me regarding the above questions and to confirm the requested extension of time. I look forward to hearing from you.

Sincerely



Mark Helmueller
General Counsel

cc: Ms. Brenda Shine

BBX Operating, LLC
3698 RR 620 South, Suite 113
Austin, Texas 78738

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TX 787
14 JAN '17
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Ms. Brenda Shine
United States Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-091099



OAR-17-000-4363
BIG "6" DRILLING COMPANY
7500 SAN FELIPE, SUITE 250
HOUSTON, TEXAS 77063
TEL: 713-783-2300
FAX: 713-783-4463
www.big6drilling.com

P1

RECEIVED JAN 18 2017

January 13, 2017

Peter Tsirigotis
U S Environmental Protection Agency
109 TW Alexander Dr Mail Code E143-01
Research Triangle Park NC 27709

Re: Information Collection Request and Survey,
per your letter dated November 14, 2016

We respectfully request a 60 day extension to complete the required documentation

(b) (4)

(b) (4)

Please confirm receipt of this letter and your agreement to grant this request.

Your consideration would be appreciated.

BIG "6" DRILLING COMPANY

Michael D. Stone
Vice President

MDS/lg

cc: Brenda Shine
U S Environmental Protection Agency
109 TW Alexander Dr Mail Code E143-01
Research Triangle Park NC 27709

Big "6" Drilling Company
7500 San Felipe, Suite 250
Houston, Texas 77063



Brenda Shine
U S Environmental Protection Agency
109 TW Alexander Dr, Mail Code E143-01
Research Triangle Park, NC 27709

27709-031099



0AR-17-000-4365

P1

RECEIVED JAN 18 2017

NORTH AMERICAN



PETROLEUM, INC.

January 3, 2017

Attn: Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T. W. Alexander Dr, Mail Code: E143-01
Research Triangle Park, NC 27709

RE: Extension Request for ICR Primary Facility ID 1466950

Dear Ms. Shine:

Please accept this letter as written request for an extension of time to complete the information collection request per your letter to North American Petroleum, Inc. received on December 15, 2016. The following is the reason for this very, needed extension:

1. (b) (4)

(b) (6)

(b) (6)

(b) (6) The amount of time it will take to collect and report the information at year end is beyond our ability to complete. We are asking for an extension date of April 15th, 2017.

Please advise us if you can grant this extension and thank you for your consideration of our request in our time of need.

Sincerely,

A handwritten signature in blue ink that reads "Richard T. Batta".

Richard T. Batta, President
North American Petroleum, Inc.
28150 N. Alma School Pkwy., Ste 103-276
Scottsdale AZ 85262

NORTH AMERICAN PETROLEUM, INC
28150 N ALMA SCHOOL PKWY STE 103-276
SCOTTSDALE AZ 85262

PHOENIX AZ 852

13 JAN 2017 PM 3 L



ATTN MS BRENDA SHINE
U S ENVIRONMENTAL PROTECTION
AGENCY
109 T W ALEXANDER DR
MAIL CODE: E143-01
RESEARCH TRIANGLE PARK NC 27709

27709-031099



0AR-17-000-4367

P1



PETROLEUM
LLC

RECEIVED JAN 18 2017

January 11, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

**RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector
Information Collection Request (ICR)**

Facility ID 1528950

Dear Mr. Tsirigotis:

On December 12, 2016, PT Petroleum, LLC, received a letter from you dated November 14, 2016, requesting information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR"):

- 1) **(b) (4)**
(b) (4) Much of the information is not readily available and requires considerable man hours to organize and assemble the data.
- 2) The timing of the ICR period is especially burdensome as it occurs during the end of one year and the beginning of another. This period is unusually busy due to budget, audit and accounting activities and other end of the year reporting obligations, not to mention the holiday season, when staff is limited or unavailable.
- 3) Monthly reporting and annual well tests and other obligations to the Railroad Commission of Texas and University Lands overlap with the ICR.

Because the information collected in the ICR requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and for the reasons stated above, we respectfully request a 60 day extension to the Part 1 Survey.

2701 Dallas Pkwy., Suite 580, Plano, Texas 75093
Tel: (972) 372-2200 • Fax: (972) 372-2201

Mr. Peter Tsirigotis
January 11, 2017
Page 2

Your consideration to our request is greatly appreciated. Please be advised that we are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Cory Richards', with a stylized flourish at the end.

Cory Richards
CEO

cc: Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



PETROLEUM
— LLC —

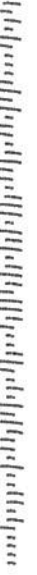
2701 Dallas Pkwy., Suite 580
Plano, Texas 75093

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DALLAS 750
12 JAN '17
PM 2 L



Ms. Brenda Shine
U. S. Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



OAR-17-000-4368

P1

RECEIVED JAN 18 2017

Resources Operating Co., Inc.
2428 Wagon Trail
Enid, Oklahoma 73703
(580) 237-7744

January 12, 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

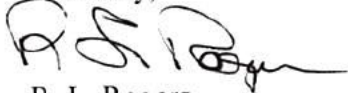
Dear Ms. Shine:

I have received the EPA letter requesting the information regarding methane emissions from the oil and gas wells operated by Resources Operating Company, Inc. and this letter is to request an extension of time for completing the requested information.

(b) (4)

(b) (4) I have looked the forms over and realized that they will take a substantial amount of time for me to complete and I would really appreciate a sixty day extension. Thank you for your consideration of this request.

Sincerely,



R. L. Rogers
Resources Operating Co., Inc.

Resources Operating Co., Inc.
2428 Wagon Trail
Enid, OK 73703

OKLAHOMA CITY OK 730

13 JAN 2017 PM 4 L



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



0AR-17-000-4370
81

STELBAR OIL CORPORATION, INC.

1625 NORTH WATERFRONT PARKWAY, SUITE #200

WICHITA, KANSAS 67206-6620

Telephone : (316) 264-8378

Fax : (316) 264-0592

RECEIVED JAN 18 2017

January 10, 2017

U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Attn: Ms. Brenda Shine

Re: Request for Extension
Information Collection Request


Dear Ms. Shine,

Stelbar Oil Corporation, Inc. (Stelbar) requests a 60 day extension of the due date to submit the Information Collection Request (ICR). Based on 60 days from date of receipt of the ICR, Stelbar would be required to submit the ICR on February 4, 2017. A 60 day extension would push the due date back to April 5, 2017.

(b) (4)

For reference, the primary Facility ID assigned to Stelbar is 1627550. Your timely consideration of this request is very much appreciated. Please contact the undersigned at 316-440-7605 or roscoe@stelbar.com should you have any questions.

Sincerely,



Roscoe Mendenhall

Engineer

Stelbar Oil Corporation, Inc.

STELBAR OIL CORPORATION, INC.
1625 N. Waterfront Pkwy, Ste 200
Wichita, KS 67133

Hasler

01/10/2017

FIRST-CLASS MAIL

US POSTAGE

\$000.46⁵

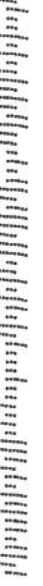


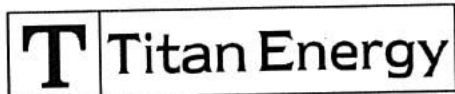
ZIP 67206

011D10651812

U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Dr, Mail Code: E143-01
Research Triangle Park, NC 27709

2770930010 R777





OAR-17-000-4371
PI

425 Houston Street, Suite 300
Fort Worth, TX 76102
t 817.698.8000
f 817.698.8343

January 12, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED
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JAN 13 2017
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Subject: Information Collection Request Part 1 Response Extension Request
Titan Energy, LLC
Facility ID: 1665900

Dear Ms. Shine,

Titan Energy LLC (Titan) is formally requesting an extension to the 60-day response deadline for Part-1 mandated by the Information Collection Request (ICR) issued by the EPA pursuant to Section 114 of the Clean Air Act. Titan operates more than 12,000 producing gas and oil wells in 13 states, however our regulatory staff that can respond to the ICR consists of just a few people. We are dedicated to providing a thorough and accurate response to the ICR but our challenge is collating and researching voluminous amounts of data during the time when our existing compliance workload involves Subpart W, Subpart OOOO and other state and local reporting.

While much of the data requested is readily available through multiple in-house databases, a significant amount is not. Our team dedicated to this project intends to physically visit facilities, manually enter data, and create supplemental databases and spreadsheets in order to obtain the necessary information. This most certainly will be burdensome and time consuming as many facilities in which information is being requested, are not named, easily described or located. Quality assurance or control for a huge number of records will require the attention of local district field staff and supervisors. These tasks greatly exceed the time burden and effort identified by the EPA in the ICR Supporting Statement.

(b) (4)

completing the ICR in the 60-day period will not be possible. Although we are working diligently, I am respectfully requests that the EPA grant us a 120- day time extension to complete the Part 1 ICR for the Facility ID 1665900, which places the response due on or before June 11, 2017.

I have attached the ICR letter referenced above as well. Thank you very much for your consideration, and if you have any questions or comments, please contact me anytime.

Sincerely,

Brian Shpakoff
Manager, EHS

Enclosures



0AR-17-000-4405
P1

CRESTON WELL SERVICE, INC.

P.O. BOX 153
Creston, West Virginia 26141-0153

P1
444 Richardsonville Rd.
Creston, WV 26141

January 12, 2017

Ms Brenda Shine
United States Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, North Carolina 27709

RECEIVED JAN 19 2017

Dear Ms Shine:

We are in receipt of a request for oil & gas information concerning “emissions” from well locations and it seems that you want us to fill out some form and say how much of what comes from our well locations.

I am told that those who looked to your website indicated that there are 1300 pages of directions and that the forms are “scary”.

(b) (4)

(b) (4), (b) (6)

I would ask that we be given a sixty (60) day extension to fill out the initial request. Perhaps then I will know what information you really want and need. I should stress that we do not vent methane – we aim to sell [or now give away] natural gas. Such happens [venting & flaring], I’m told in South America, Nigeria and other such places.

Thank you for your help and assistance with this matter.

Sincerely yours,


Alvin L. Engelke



CRESTON WELL SERVICE

P.O. BOX 153
Creston, West Virginia 26141-0153

444 Richardsonville Rd.
Creston, WV 26141

CERTIFIED MAIL®

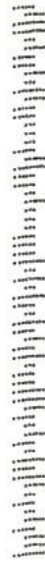


7015 1520 0000 7640 9971



Ms Brenda Shine
U. S. Environmental Protection Agency
109 T. W. Alexander Drive
Mail Code: E143-01
Research Triangle Park, North Carolina
27709

27709-031099



January 6, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID *[provide number and name of entity that received the ICR – provide multiple Facility ID and name if your company received more than one ICR]*

Dear Mr. Tsirigotis:

On December 9, 2016, my company, West Tuleta Operating Company, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility(ies). For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR")¹.

(b) (4)
(b) (4)

Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, and Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me. All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"? I have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. How does EPA view this equipment? Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016,

¹ [Many companies received requests that were "inaccurate" in terms of title/address, etc. You should reference that fact and correct the record – perhaps in a separate paragraph.]

Mr. Peter Tsirigotis
January 6, 2017
Page 2

letter? If the information is deemed to be incorrect or inconsistent, what kind of time line will we be allotted to amend our submission. What kind of actions are we going to be expected to follow up on after submission of these forms? If wells are subsequently shut-in or plug and abandoned, how do we go about removing them from the Part 1 & Part 2 surveys? What sort of confirmation can I expect to receive after submission and to confirm that our wells are in compliance? Should we/Will we have to post this confirmation at the well site to prevent any further requests or citations from the EPA or other entities? Is it possible to have a better idea of what wells are subject to fugitive gas emission rules? Can we get a list of what the EPA considers to be a fugitive gas component(s)? Anything to help us complete the ICR to the best of our knowledge will be much appreciated.

Please contact me if you have any questions and I look forward to hearing from you.

Thank you for your time and consideration.

Scott Kreindl/Engineer

cc: Ms. Brenda Shine

R. W. DIRKS PETROLEUM ENGINEER, INC.

OIL FIELD DRILLING & PRODUCTION SUPERVISION
P.O. DRAWER 200
TULETA, TEXAS 78162-0200

NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES

TX 78011
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NECESSARY
IF MAILED
IN THE
UNITED STATES

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January 13, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 19 2017

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1513750-Pillar Energy, LLC

Dear Mr. Tsirigotis:

I received your letter back in December addressed to Pillar Energy, LLC dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4), (b) (6)

(b) (4) Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability.

Also, due to the winter season we have a number of operational obligations that limit our field personnel from assisting in the gathering of some of the information.

Lastly, we are entering tax season which limits the amount of time we have to work on your request. With limited personnel, I have to balance the ICR with reporting obligations to state agencies, operational obligations as mentioned above as well as to ensure taxes are reported when due and royalty/working interest owners have the appropriate documentation in their hands prior to tax deadlines.

In addition to my request, I did have a couple questions when reviewing the survey:

- 1) What description can I use for the Facility ID or Unique Surface Site ID? I intended to use the wells' respective API number for surface site ID, but I wasn't sure if this is acceptable.

- 2) And I'm unclear what description I should use for compression or dehydration facilities. We use names for those facilities but they do not have an ID number associated with them. I assume those to fall under surface sites?

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Isner', with a stylized, flowing script.

Jeff Isner
CEO
Pillar Energy, LLC

cc: Ms. Brenda Shine

Pillar Energy, LLC
P O Box 2682
Charleston, WV 25330

0205161

CHARLESTON

WV 250

13 JAN '17

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Office of Air Quality Research
US EPA

109 T. W. Alexander Dr.
Research Triangle Park, NC

22009

Attn: Mr. Tsingotis

27709-000209



0A2-17-000-4409
PI

James K. Wischkaemper
1200 South Main Street
Shamrock, TX 79079
806-256-2157

January 12, 2017

RECEIVED JAN 19 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID 1727200 Wischkaemper, James K.

Dear Mr. Tsirigotis:

On December 13, 2016, my company, Wischkaemper, James K., received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 120 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

Much of the information is not readily available and will require me personally to visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff is off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sarah Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to existing environmental safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me. As I work through this ICR, clarification may be needed for various aspects of the survey that are unclear at which time I may require your assistance.

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,



Teresa Reeder

Wischkaemper, James K. 1727200

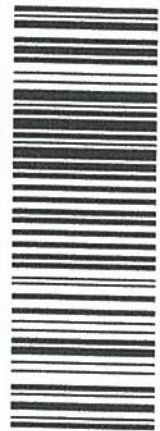
Cc: Ms. Brenda Shine

James K. Wischkaemper
1200 South Main St.
Shamrock, TX 79079

RETURN RECEIPT
REQUESTED

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS, FOLD AT DOTTED LINE

CERTIFIED MAIL®



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27709

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Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

2770980310 R777



OAR-17-000-4411
P1

PENNSYLVANIA GENERAL ENERGY COMPANY, L.L.C.

120 Market Street
Warren, PA 16365

Phone: 814-723-3230
Fax: 814-723-3502

January 11, 2017

RECEIVED JAN 19 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID [Pennsylvania General Energy LLC - 2602000 - 2602001 - 2602002;
Pennsylvania General Energy CORP - 1739650 - 1739651 - 1739652]

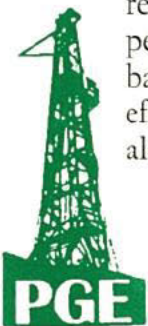
Dear Mr. Tsirigotis:

On December 9, 2016, Pennsylvania General Energy, LLC, Pennsylvania General Energy Corp, Amber Oyler and Dave Straub received letters from you dated November 14, 2016, requesting extensive information regarding the above referenced facility(ies). For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request (ICR).

(b) (4)

(b) (4) We are responsible for collecting information on over 1,324 wells and over 70 centralized processing facilities that are spread as far as 200 miles from the central office. Much of the information is not readily available and some of it will require that I visit each site for accurate reporting. As you know, this information collection requires PGE to certify the accuracy of the information provided to the United States Environmental Protection Agency (EPA) and subjects the PGE employee to criminal liability. (b) (4) the ICR request period falls during the holiday season and hunting season when many of the limited staff members have scheduled time off. Additionally, it is unclear to me how to calculate when the response is currently due because of the holidays and request that you indicate in your response the date the EPA considers their request due.

Unfortunately, the timing could not be worse as we are working on annual emissions inventory, annual greenhouse gas (GHG) reporting and Pennsylvania DEP reporting requirements. In addition there are PA DEP leak detection and repair inspections that all fall during the EPA ICR request period. Along with these requirements, the State of Pennsylvania is updating their GP-5 requirements which will add to the reporting and record keeping requirements. This GP-5 draft period also falls during the EPA ICR request period. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are striving to comply with the ICR while also attending to the existing EPA and PADEP Oil and Gas regulations.



*Producing the energy we need.
Protecting the environment we treasure.*

www.penngeneralenergy.com

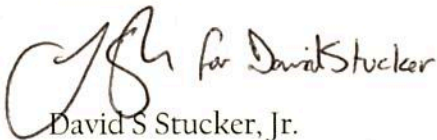
In addition to requesting additional time, various aspects of the Part 1 Survey and Part 2 Survey are unclear to me.

- Whose responsibility is it to respond when there is more than one owner?
- Whose responsibility is it to respond when the operator is different than the owner?
- Pennsylvania General Energy received 2 letters. One letter was addressed to PGE Corp; and the other to PGE LLC. There are no wells/facilities under PGE Corp. I contacted the EPA to clarify this issue. I was told to use the associated Facility ID. However, PGE received 2 different Facility ID's. Which one am I legally required to use?
- All of our gas/oil is "produced" for "sales." These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?
- I have tanks on site that we commonly refer to as "gun barrels." I do not consider them "separators" but they do separate some gas/oil from water. How does the EPA view this equipment?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016, letter?

Please contact me with any questions. I look forward to hearing from you.

Thank you for your assistance in meeting the compliance needs for this EPA ICR. I look forward to working with the EPA in meeting the environmental standards set forth.

Sincerely,



David S Stucker, Jr.
Regulatory Compliance Specialist
Pennsylvania General Energy Company, LLC
120 Market Street
Warren, Pennsylvania 16365
Phone: (814) 723-3230
Cell: (814) 779-3593
Email: davidstucker@penngeneralenergy.com

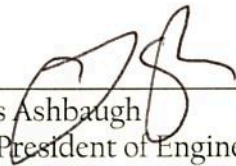
cc: Ms. Brenda Shine

SELF-CERTIFICATIO STATEMENT

OIL AND NATURAL GAS SECTOR:

I certify that the reported information provided in the attached report represents a true, accurate, and complete record of the test results of studies generated or owned by Pennsylvania General Energy Company, L.L.C. and that the values of the properties reported are reliable based on information and belief formed after reasonable inquiry.

PENNSYLVANIA GENERAL ENERGY COMPANY, L.L.C.



James Ashbaugh
Vice President of Engineering

Date: 1/11/17

10AR-17-000-4415
P1



January 11, 2017

RECEIVED JAN 19 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, N.C. 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID: 1353500

KAT Energy Ltd, P.O. Box 32162, Amarillo, TX 79120 (Correct Address)

KAT Energy Ltd, P.O. Box 230, Amarillo TX 79105-0230 (Wrong Address)

Dear Mr. Tsirigotis:

On December 8, 2016, my company, KAT Energy Ltd, received two letters from you dated November 14, 2016, requesting extensive information regarding the above referenced Facilities. Each of these letters have the same Facility ID number. The first address listed above is correct and is the letter my company is responding to.

For the following reasons, my company is respectfully requesting an extension of 120 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

(b) (4)

Much of this information is not readily available and will require me, and my pumper to visit each site, as this is not a task I can delegate entirely to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited staff, the ICR falls over the Holiday Season when we are off part of the time. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the letter when the EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, there are reports to our investors for the year that must be done in this same time period. I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and

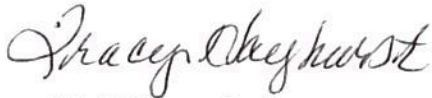
environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental safety and health responsibilities.

I have some questions as to what it is exactly that is to be put into Part 2 of the survey. We are a small natural gas company and a lot of the things listed in this survey do not really seem to apply to my company. Some of the questions I have are as follows:

- We are a small natural gas company, so how are these reported on your spread sheets?
- We have no oil wells and we do not have tank batteries or separators, so I am not sure what information you want from my company.

I look forward to hearing from you. Please contact me if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Tracy Hayhurst".

KAT Energy Ltd
Tracy Hayhurst, Owner

Cc: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, N.C. 27709

KAT
ENERGY LTD
P.O.Box 32162
Amarillo, TX 79120

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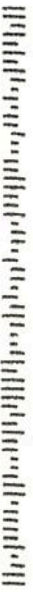
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Attn: Ms Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, N.C. 27709

27709+0310





0A12-17-000-4421

P1

P.O. BOX 1422 PAMPA, TEXAS 79066-1422 806/669-9617 Fax 806/665-9719

OIL & GAS, INC.

January 11, 2017

RECEIVED JAN 19 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Facility ID 1699400

Dear Mr. Tsirigotis:

On December 12, 2016, WBD Oil & Gas, Inc. received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 120 days, until June 10, 2017 to respond to the information collection request (ICR).

(b) (4)

(b) (4) Much of the information is not readily available and will require me to personally visit each site. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency and subjects me to criminal liability. (b) (4)

(b) (4)

(b) (4) the ICR began during the Holiday Season when some of our limited staff were off work. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays; therefore, I request that you indicate in the response when EPA considers the response due.

Timing of the ICR is also problematic for us, as other reporting obligations are also due, such as Tier II, SPCC inspections, and other regular monthly state reporting. Responding to the ICR's original deadline is difficult with limited personnel as we must balance all reporting obligations, the ICR, and continue to ensure that our operations run efficiently and in an environmentally responsible manner. Extending additional time would assist us in safely balancing these tasks.

Thank you for your consideration of our request,

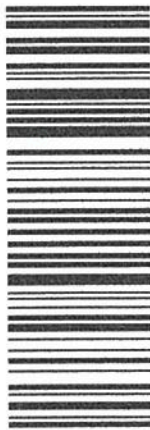
Stacey Ladd, Vice-President
WBD Oil & Gas, Inc.



P.O. BOX 1422
PAMPA, TEXAS 79066-1422

OIL & GAS, INC.

CERTIFIED MAIL™



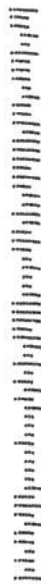
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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

2770980310 R777



0AR-17-000-4422
P1

H & L EXPLORATION COMPANY, LLC
CSODA OPERATING COMPANY, LLC
DBA H & L OPERATING CO., LLC
www.hlexploration.com

MAILING
P.O. BOX 7506
AMARILLO, TX 79114-7506
806 353 4331

5500 MEADOWGREEN DR
AMARILLO, TX 79110
806 353 4331 (FAX)
RECEIVED JAN 19 2017

January 10, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID: 1275950 H & L Exploration Company, LLC
Facility ID: 1276050 H & L Operating Co., L.L.P.
Facility ID: 1276100 H & L Operating Co., L.L.P.

Dear Mr. Tsirigotis:

On or about December 5, 2016, my companies, H&L Exploration Company LLC and H&L Operating Co., received letters from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility IDs. For the following reasons, I respectfully request an extension of 120 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

Much of the

information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting and Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

(b) (4)

Much of the information needed for the ICR is not readily accessible due to this problem.

In addition to requesting additional time, the various aspects of the Part 1 Survey are unclear to me.

- Whose responsibility is it to respond when the operator is different than the owner?
- All of our gas/oil is "produced" for "sales". These questions in Sections 3 and 4 do not make sense to me? When would the answer to these questions be "no"?
- Is the "surface site ID" asked for in Sections 3 and 4 the same as the Facility ID provided in the November 14, 2016 letter?
- Are salt water tanks to be included in the tank count?

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to read 'Gilbert Brown', with a long horizontal flourish extending to the right.

Gilbert Brown
President/Owner

Cc: Ms. Brenda Shine

HAL
EXPLORATION

P.O. BOX 7506 • AMARILLO, TX 79114-7506

**RETURN RECEIPT
REQUESTED**

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

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79109
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\$6.47

R2304N117802-15

MS. BRENDA SHINE
UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY
109 T.W. ALEXANDER DRIVE MAIL CODE: E143-01
RESEARCH TRIANGLE PARK, NC 27709

2770980910 R777

OAR-17-000-4433

Pl Shakespeare Oil Company
INCORPORATED
202 WEST MAIN STREET
SALEM, ILLINOIS
62881
WWW.SHAKESPEARE-OIL.COM

January 12, 2017

RECEIVED JAN 19 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID: 1596700

Dear Mr. Tsirigotis:

On December 5, 2016, Shakespeare Oil Company, Inc. received a letter from your office dated November 14, 2016, requesting information relative to all our oil and gas producing facilities and well sites assigned under the Facility ID number referenced above. According to your letter we are to have this information compiled and Part 1 of the ICR survey completed and filed within 60 days, which in our case is February 3, 2017. Due to the number of facilities operated by our company in numerous states, and the limited personnel available to assign to this task, I am requesting a 60 day extension to have ample time to respond to this unprecedented request.

(b) (4)

(b) (4) This ICR is extremely untimely for our industry, and our company in particular, to assign employees to gather information for over 340 wells and nearly 100 tank battery sites spread across 5 states. Much of this information is not readily available and will have to be researched and compiled by my staff. In addition to this ICR, we are also having to comply with required annual UIC reports, SARA Title III reports, and other regulatory and environmental reporting requirements. At the same time we have to maintain our business operations in a safe and environmentally responsible manner with the employees we have. This ICR has not only placed an additional burden on my staff to gather and compile all the information you are requesting, but it also requires me to certify as to the accuracy of the information in the ICR.

In addition, some of the questions asked on Part I, Table 3 of the ICR are unclear at best as to what specifically you are asking. First, is the Unique Surface Site ID supposed to be tied to the assigned Facility ID for our company, or is it tied to an existing permit or ID number assigned by the State where the facility is located? Secondly, Column K asks for the number of

separators present at a Surface Site. Does this include gun barrels, or only pressurized vessels? Thirdly, Columns M and N ask for the number of storage tanks <10 bbl/day or >10 bbl/day. If a tank battery has three storage tanks, typically only one has oil being produced into it at a time, and the other two are idle, so do I treat only the one tank as receiving < or > 10 bbl/day, or do I count all three as receiving that volume every day?

Part I, Table 4 is also confusing. The information requested for Columns B-R are identical questions to those in Part I, Table 3, which is redundant and seems to treat the Surface Sites (tank batteries or central production facilities) the same as Well Sites. Am I supposed to complete a separate "row" for each well site, or one row for each tank battery site as in Table 3?

I look forward to hearing from you regarding my request for a 60 day extension for the ICR for the reasons stated above, and to your response to my questions regarding the correct way to complete your form.

Please feel free to contact me if you have any questions.

Sincerely yours,

Shakespeare Oil Company, Inc.



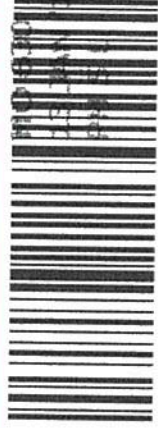
Bryan T. Hood, President

CERTIFIED MAIL

Cc: Ms. Brenda Shine
United States Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Shakespeare Oil Company, Inc.
202 West Main Street
Salem, IL 62881

CERTIFIED MAIL



7010 1060 0000 7083 2032

Hasler

01/13/2017

US POSTAGE

\$003.76⁵

FIRST-CLASS MAIL



ZIP 62881

011E1167157C

Ms. Brenda Shine
United States Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709-031099



DAE-17-000-4424
P1



THREE SPAN OIL & GAS, INC.
400 W. Illinois, Suite 1250
P.O. Box 51538
Midland, TX 79710-1538
Office: 432-684-6511
Fax: 432-684-6495

January 12, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RECEIVED JAN 19 2017

Facility ID 1663200; Three Span Oil & Gas, Inc.

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Dear Mr. Tsirigotis:

On December 9, 2016, my company, Three Span Oil & Gas, Inc., received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4) and they are responsible for collecting information on 220 active wells spread out over 13 counties, the nearest of which is 70 miles from our office in Midland, Texas. Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. (b) (4) (b) (4) the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. It is therefore unclear to me how to calculate when the response is currently due because of the holidays, and I request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III, quarterly & year-end financial reporting to investors, current drilling projects in Scurry County, as well as other miscellaneous year-end & beginning of year duties & tasks. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, several components of the Part 1 Survey are unclear to me. For one, I am unsure about the question regarding fugitive emissions, and thus answering the question will take time and research, as I would not like to be incorrect in answering. For another, I am

Mr. Peter Tsirigotis

January 12, 2017

Page 2

unsure whether you'd like me to include Shut-In & TA-ed wells, or, for that matter, plugged wells & leases on which we still have liability, even if there are no physical facilities any longer. Beyond those questions, I share many of the concerns expressed by peer companies about the answering of these questions, and I worry that rushing to complete the survey would ultimately be to the detriment of my company and lead to inaccurate answers.

Please contact me if you have any questions and I look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink, reading "Edgar Earl Baldrige IV". The signature is fluid and cursive, with the last name "Baldrige" being the most prominent part.

Edgar Earl Baldrige IV "E.J."
Land Manager

cc: Ms. Brenda Shine



THREE SPAN OIL & GAS, INC.
400 W. Illinois, Suite 1250
P.O. Box 51538
Midland, TX 79710-1538



THREE SPAN OIL & GAS, INC.

E. J. Baldridge

400 W. Illinois, Ste. 1250

P.O. Box 51538

Midland, TX 79710-1538

Office: 432/684-6511

Mobile: 432/214-1138

Fax: 432/684-6495

email: ejb@threespan.com

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Ms. Brenda Shine
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
109 T.W. Alexander Dr.
Research Triangle Park, NC 27709

2770900310



Bay Rock Operating Company
P.O. Box 12468
San Antonio, Texas 78212-046
210-735-8400

RECEIVED JAN 19 2017

January 10, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1052950

Dear Mr. Tsirigotis:

On December 12, 2016, my company, Bay Rock Operating Company, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4)

Myself and my field foreman are responsible for collecting information on approximately fifty facilities that are spread out over a total of 450 miles from north to south. Much of the information is not readily available and will require me to personally visit each site, as this is not a task I can delegate to someone else. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. (b) (4) the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, Sara Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are not only confusing, but unknown to this engineer with some forty years of experience in this business. For instance, it is requested that we state if a facility is subject to the fugitive emission requirement on 40 CFR 60.5397a of Subpart 00009. If requesting a particular piece of information referenced in an obscure government code (it is obscure as a Google search revealed little to nothing), it would behoove you to provide a copy of the aforementioned code to the compliant parties. The EPA should attempt to make known what is required in a manner in which a common citizen can comprehend without the assistance of an expensive consultant. Your request will be complied with, but it is necessary that I have an extension (b) (4)

(b) (4), (b) (6)

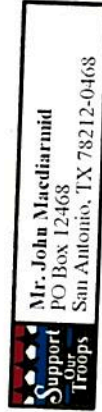
Please contact me if you have any questions and I look forward to hearing from you.

Respectfully,



John MacDiarmid
Bay Rock Operating Company

cc: Ms. Brenda Shine



Mr. John Macdiarmid
PO Box 12468
San Antonio, TX 78212-0468

SAN ANTONIO, TX

TX 78212
14 JAN '17
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Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Plannig & Standards
US EPA
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099



0AR-17-000-4436

P1

A.N. MacDiarmid Company
P.O. Box 12468
San Antonio, Texas 78212-046
210-735-8400

RECEIVED JAN 19 2017

January 10, 2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID 1052950

Dear Mr. Tsirigotis:

On December 12, 2016, my company, Bay Rock Operating Company, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the following reasons, I respectfully request an extension of 60 days to respond to the information collection request ("ICR").

(b) (4)

(b) (4) I am responsible for collecting information on approximately two facilities. As you know, this information collection requires me to certify to the accuracy of the information provided to the United States Environmental Protection Agency ("EPA") and subjects me to criminal liability. In addition to limited/reduced staff, the ICR falls over the Holiday Season and hunting season when many of the limited staff are off. Additionally, it is unclear to me how to calculate when the response is currently due because of the Holidays and request that you indicate in the response when EPA considers the response due.

In addition to the complications associated with limited staff and Holidays, the timing could not be worse with annual emissions inventory, annual greenhouse gas ("GHG") reporting, State Title III. With the limited personnel, I have to balance reporting obligations and the ICR with continuing to ensure operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

In addition to requesting additional time, the various aspects of the Part 1 Survey are not only confusing, but unknown to this engineer with some forty years of experience in this business. For instance, it is requested that we state if a facility is subject to the fugitive emission

requirement on 40 CFR 60.5397a of Subpart 00009. If requesting a particular piece of information referenced in an obscure government code (it is obscure as a Google search revealed little to nothing), it would behoove you to provide a copy of the aforementioned code to the compliant parties. This policy, I believe, is part of an effort by an outgoing administration that places an onerous and undue burden upon the aggrieved parties (myself and every other oil and gas producer in the country). This is simply a case of "scorched earth" politics by a petulant child of a president who is upset by the fact that the incoming administration is a complete repudiation of his policies and ideology. Your request will be complied with, but it is necessary that I have an extension as the burden you are placing upon me will literally have the effect of

(b) (4), (b) (6)

(b) (4), (b) (6)

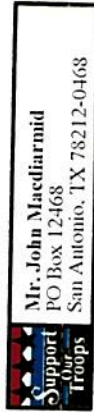
Please contact me if you have any questions and I look forward to hearing from you.

Respectfully,

A handwritten signature in blue ink, appearing to read "John MacDiarmid", followed by a large, stylized circular flourish.

John MacDiarmid
A.N MacDiarmid Company

cc: Ms. Brenda Shine



CALL AMT 12/14/2017

TX 78212

01/14/2017

032A 0061829730

0205-07



Peter Tsirigotis
Director, Sector Policies & Programs Division
Office of Air Quality Plannig & Standards
US EPA
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099



OAR-17-000-4274

P2

enerPLUS

Lisa Thompson
called 1/5

December 12, 2016

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

RECEIVED JAN 5 / 2017

Dear Ms. Shine:

On December 9, 2016, Enerplus Resources (USA) Corporation ("Enerplus") received a Part 2 – Detailed Facility Survey Information Collection Request (ICR) per Docket ID No. EPA-HQ-OAR-2016-0204. To provide EPA with the most accurate possible information, we respectfully request a 60-day extension for the Part 2 response. This extension is necessary for Enerplus to ensure adequate sampling points exist, pull necessary samples for laboratory analysis and for Enerplus to perform the necessary detailed review and uploading of the most accurate information. The 60-day extension request would set a new Part 2 Enerplus completion deadline for the Part 2 response of August 6, 2017.

Thank you for your consideration of this request. If you should have any questions or require additional detail, please don't hesitate to contact me via email at scottmason@enerplus.com or via phone at 720-279-5581.

Sincerely,



Scott Mason
Lead – Environmental Programs

enerPLUS

ENERPLUS RESOURCES (USA) CORPORATION
US Bank Tower, Suite 2200
950 - 17th Street
Denver, Colorado 80202-2805

CERTIFIED MAIL™



7012 3050 0000 7167 0751

DEC 19 2016



Office of Air Quality Planning & Standards
U.S. Environmental Protection Agency
Mail Code 2822IT, 1200 Pennsylvania Ave N.W.
Washington, DC 20460

20460-

Attn: Brenda Shipe

15

December 16, 2016

Mr. Peter Tsirigotis
United States Environmental Protection Agency
Office of Planning and Standards
Director, Sector Policies and Programs Division
Washington, D. C. 20460

Re: Primary Facility ID - 1717800

Dear Mr. Tsirigotis:

We are in receipt of the "Information Collection Request" pursuant to Section 114 of the Clean Air Act.

We respectfully request an extension of the 60 day information completion requirement. While we will be devoting our time and best efforts to comply, we feel the 60 day completion requirement is most likely unobtainable.

Please allow us to complete the Information Collection Request within 120 days of receipt.

Looking forward to working with you and your office. Please reply ASAP.

Sincerely,

Fred E. Gough

FRED E. GOUGH
WHITT INVESTMENTS, INC.
P O BOX 1925
GRAHAM, TEXAS 76450

0AR-17-000-4087

P1

WPXENERGY™

He sent
1-12-17

January 10, 2017

Brenda Shine
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Code 28221T, 1200 Pennsylvania Ave. NW.
Washington, DC 20460

Re: Extension Request for ICR No. 1732600

Dear Ms. Shine:

WPX Energy Mid-Continent Co. recently received an Information Collection Request (ICR), EPA ICR No. 1732600 on December 12, 2016. As EPA is aware, this request is unprecedented in nature both in terms of its breadth and depth of detail. In order to provide EPA with the most accurate possible information, we respectfully request a 90 day extension for both Parts I and II. This extension is absolutely necessary for us to conduct the detailed reviews necessary to provide information on the requested facilities.

As was pointed out during the comment period by Western Energy Alliance, industry expects the anticipated burden of the ICR to be at least three to five times greater than EPA estimates. Much of the requested information will require detailed site-by-site calculations that cannot and should not be rushed to complete within the currently allotted timeframe. By granting this extension and allowing 150 days to respond to Part I and 270 days to respond to Part II, EPA will be giving our company much-needed time to respond to the ICR.

If you have any questions or require more information, please do not hesitate to contact me at (539) 573-0306 or jodell.mizoue@wpxenergy.com. Thank you for your consideration of this request.

Sincerely,



JoDell Mizoue
Environmental Manager

DAR-17-000-4296

P1



KANTOR OIL COMPANY

15 W. Sixth Street

Suite 2601

Tulsa, OK 74119

Ph. (918) 583-6412

Fax (918) 583-2999

January 7, 2017

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Primary Facility ID 1352400

Dear Ms. Shine:

We are a small operator and lack the resources and man power to prepare this ICR form in a timely manner. We ask that you give us an extension of time to get this information gathered and compiled on this form.

Please acknowledge receipt and advise us of the approval of the extension of time. You may use my email doug@kantoroil.com to expedite communications.

Thank you.

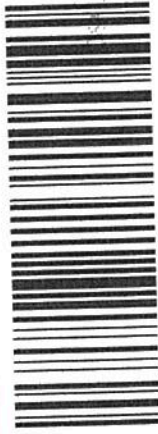
Sincerely,

Doug Briggs
Controller

My e-GGRT code is JMD0-Y1WD

Kantor Oil Company, LLC
15 W 6th St., Suite 2601
Tulsa, OK 74137

CERTIFIED MAIL™



7007 1490 0002 6714 2862

TULSA OK 741

JAN 2017



Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

27709+0310





OPR-17-000-4348

P1

PO Box 24300, M/C LS700
Oklahoma City, OK 73124
EnableMidstream.com

January 10, 2017

VIA CERTIFIED MAIL #7015 1660 0000 5921 3301

RECEIVED JAN 17 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

**Re: Oil and Gas Information Collection Request
Enable Atoka, LLC (ICR ID 2269000)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Atoka, LLC (ICR ID 2269000), received the ICR for the Gathering and Boosting Segment on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

Enable Atoka appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that Enable Atoka and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., Enable Atoka respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (405) 576-8234 or at laura.guthrie@enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Atoka, LLC

A handwritten signature in blue ink that reads 'Laura L. Guthrie'.

Laura L. Guthrie
Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



ENABLE™

MIDSTREAM PARTNERS

PO Box 24300, LS700
Oklahoma City, OK 73124



OKLAHOMA 2000750222

OK 730

10 JAN '17

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RESEARCH TRIANGLE PARK, NC 27709

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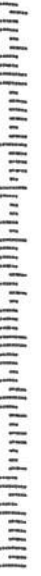
JAN 10 2017

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MAILED FROM ZIP CODE 73102

27709-091099



DAR-17-000-4353

Columbia Pipeline Group

5151 San Felipe, Ste 2400, Houston, Texas, USA 77056

Tel: 713.386.3434

Mitch_Lagerstrom@transcanada.com

P1



RECEIVED JAN 17 2017

January 11, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC, 27709

**Re: Oil and Gas Information Collection Request
Part 1 Survey Request for Extension**

Dear Ms. Shine,

Columbia Pipeline Group (CPG), which is now a wholly owned subsidiary of TransCanada, respectfully requests a 60 day extension of the Oil and Gas Information Collection Request (ICR) Part 1 Surveys dated November 14, 2016, and received on various dates in December 2016. Attachment A provides the list of the Part 1 ICRs the request for extension applies. The request for the additional 60 days is to allow adequate time to plan, coordinate, and execute all the activities necessary to fully comply with the ICR.

Please acknowledge as soon as possible if the request for extension is approved. Feel free to give me a call at 713-386-3565 should you have any questions, or require additional information.

Sincerely,

Mitch Lagerstrom
Environmental Services/US Natural Gas
TransCanada/Columbia Pipeline Group

Attachment A
List of Part 1 ICRs
90 Day Extension Request

Facility	ICR ID
ANR PIPELINE COMPANY Part 1 and Part 2	1025750
ANR PIPELINE COMPANY Part 1 and Part 2	1025700
Mid Michigan Gas Storage Co. - Part 1 and Part 2	1434450



0ARZ-17-000-4355 P1

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January 9, 2017

Ms. Brenda Shine
U.S Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code e-143-01
Research Triangle Park, NC 27709

Certified Mail 7012 2920 0002 0546 4624
Email shine.brenda@epa.gov

Re: Request for 60 day extension to file ICR
Cirrus Exploration Company

Dear Ms. Shine;

Cirrus Exploration Company (Cirrus) hereby requests a sixty (60) day extension to file its response to EPA Information Collection Request (ICR) dated November 14, 2016.

In support of the request for extension Cirrus hereby notifies the EPA that on December 16, 2016 a range fire located just north of Skellytown, Texas affected a portion of properties subject to the ICR causing an operational shut down of some of the facility. Cirrus is in the process of assessing and reconstructing the damage therefor is unable to formulate a complete and accurate response at this time.

Sincerely,

CIRRUS EXPLORATION COMPANY

A handwritten signature in blue ink, appearing to read "Craig Bryan", with a horizontal line extending to the right.

Craig Bryan

President

/sb

Craig Bryan
CirrusExploration Company
1801 South Polk St
Amarillo TX 79102-3153

X

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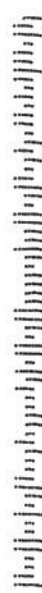


7012 2920 0002 0546 4624



Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Dr, Mail Code e-143-01
Research Triangle Park, NC 27709

277090010 R777



January 10, 2017

P1

Peter Tsirigotis
Director, Sector Policies and Programs
Division of Air Quality Planning and Standards
United States Environmental Protection Agency
Washington, D. C. 20460

RECEIVED JAN 17 2017

RE: Information Collection Request (ICR) – Extension Request

Dear Mr. Tsirigotis:

Regarding the letter dated November 14, 2016, received on December 9, 2016, Kriebel Minerals, Inc. (Kriebel) respectfully requests an extension of 60 days to complete Part 1 of the Information Collection Request. Kriebel is a family owned and operated "Conventional" (shallow gas) producer within the Commonwealth of Pennsylvania.

We have approximately 1,700 wells/facilities that we will need to provide information on, based on our preliminary review of the Part 1 Survey. Due to several factors such as the physical and environmental challenges that impact oil and gas operations in the winter months, the Holiday season, and the demands associated with the annual reporting obligations required by the Pennsylvania Department of Environmental Protection, Kriebel is concerned that it may not be able to meet the required deadline of February 7, 2017. Kriebel understands and appreciates the value of complete and accurate data and wants to ensure that it has adequate time to collect, organize, and present the information to the Environmental Protection Agency, while meeting our existing environmental, safety and health obligations.

Please consider Kriebel's request of an extension of 60 days to complete Part 1 of the Information Collection Request.

Sincerely,



Shane C. Kriebel
Kriebel Minerals, Inc.
Production Business Manager

cc: Brenda Shine, United States Environmental Protection Agency

KRIEBEL COMPANIES

633 Mayfield Road
Clarion, Pennsylvania 16214

Developing Resources. Sharing Success.

PITTSBURGH

PA 150

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Brenda Shine
United States Environmental Protection Agency
109 T.W. Alexander Drive
Research Triangle Park, NC 27709

27709-031099



January 10, 2017

VIA CERTIFIED MAIL #7015 1660 0000 5921 3219

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

RECEIVED JAN 17 2017

**Re: Oil and Gas Information Collection Request
Enable Products, LLC
Wetumka Gas Processing Plant (ICR ID 6001180)**

Dear Ms. Shine:

The EPA is conducting an Information Collection Request (ICR) to develop emissions standards for oil and gas facilities. Enable Products, LLC (EP), received the ICR for the Wetumka Gas Processing Plant (ICR ID 6001180) as a Storage Facility on December 12, 2016. Responses are due within 180 days of receipt of the ICR, therefore on or before June 11, 2017.

EP appreciates the EPA extending the due date from 120 days to 180 days after receipt. However, due to the number of ICR requests that EP and other affiliated companies and facilities received, and the overlap with regulatory required reporting for multiple state emissions inventories, Title V annual compliance certifications, annual greenhouse gas reporting under the Mandatory Reporting Rule, etc., EP respectfully requests a 45 day extension until July 26, 2017. The extension would reduce the undue burden, eliminate additional expenses for third party assistance, and improve the quality of the data that will be reported.

We would appreciate a response confirming that our request for an extension is approved. If you have any questions or require additional information, please feel free to contact me at (405) 576-8234 or at laura.guthrie@enablemidstream.com. Thank you for your assistance in this matter.

Sincerely,
Enable Products, LLC



Laura L. Guthrie
Director, Air Program
Environmental, Health & Safety

Cc: Jeff Coburn, RTI International, P.O. Box 12194, Research Triangle Park, NC 27709



PO Box 24300, LS700
Oklahoma City, OK 73124

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MS. BRENDA SHINE
U.S. ENVIRONMENTAL PROTECTION
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CODE: E143-01
RESEARCH TRIANGLE PARK, NC 27709



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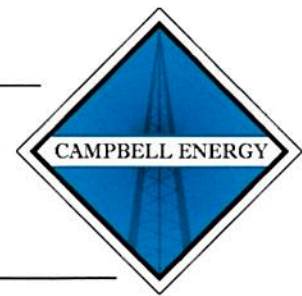
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CAMPBELL ENERGY

Jakob Campbell, President

P1



1-13-17

Request for an extension for Facility ID 1106550 for Section 114 of the Clean Air Act reporting

Attn: Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Ms. Shine,

Campbell Energy LLC respectfully requests an extension on the reporting process of section 114 of the clean air act. Our request for the extension are due to the following circumstances:

- Reduced staff due to prices of oil/natural gas
- End of year reporting obligations with reduced staff
- Planned holiday/vacation reducing availability of qualified staff
- Lack of clarity in the instructions
- Number of wells/operations to report on requiring onsite visit covering large geographic regions.
- Lack of qualified 3rd parties in our areas of operation to assist us in the reporting

It is based on these above reasons that we would request an extension so we can properly fill out our paperwork and submit back to you as soon as possible. We are requesting a 60 day extension.

I appreciate your consideration of this request and look forward to hearing from you. You may reach me at 618-384-9529 or at jake@campbellenergyllc.com

Sincerely,

Jake Campbell, member Campbell Energy LLC

RECEIVED JAN 18 2017

Campbell Energy, LLC
1238 Co Rd 1500N
Carmi, IL 62821

ST LOUIS
MO 63103
13 JAN 13
PM 6 L



Attn: Ms Brenda Skine
U.S. Environmental Protection Agency
109 T.W. Alexander Dr Mail Code E143-01
Research Triangle Park, NC 27709

27709-031099





0AR-17-000-4366

PS

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January 11, 2017

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

Re: PGP Operating, LLC,
Public Gas Partners, Inc,
PGP Gas Supply Pool No.3, LLC
Primary Facility ID: 1739550 and 2636000
Information Collection Request (ICR)

Dear Ms. Shine:

PGP Operating, LLC, Public Gas Partners, Inc, PGP Gas Supply Pool No.3, LLC, (PGPs collectively) have received the above referenced ICRs dated November 14, 2016 on December 6, 2016. PGPs cordially requests the EPA for extension of time to complete the ICRs due to limited staff, other permit obligations due dates and end of the year transition. The additional time will allow us to provide the very best information available to meet your standards.

We look forward to your timely response and if you have any questions, please contact me at (205) 554-3129.

Sincerely,

PGP Operating, LLC

Phillip W. Dunn
EHS Coordinator

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17300 Brookwood Parkway
Vance, Alabama 35490

Ms. Brenda Shine
U.S. Environmental Protection Agency
109 T.W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

SA12-17-0004410
P1



410 17th Street, Suite 900
Denver, CO 80202

Stan Garner
Vice President Risk Management
stan.garner@discoverynr.com
303.571.6151

January 16, 2017

*Via UPS overnight and
Email tsirigotis.peter@epa.gov*

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

Re: Request for Extension of Time to Respond to Information Collection Request
Facility ICR ID: 2226000

Dear Mr. Tsirigotis:

On December 8, 2016 Discovery Natural Resources LLC ("Discovery") received your letter dated November 14, 2016, requesting extensive information regarding the above referenced Facility. For the reasons set forth below, I respectfully request an extension of 90 days to respond to Part 1 of the information collection request ("ICR").

Discovery is a small operator with limited staff. Collecting the required information, which is not all readily available, and responding to the ICR will stress Discovery's existing resources. Discovery has recently retained a third party consultant to assist Discovery in properly interpreting the various ICR reporting requirements and responding to the ICR. In addition, the ICR fell over the 2016 holiday season when many of our limited staff and available consultants were off. Further, responding to the ICR comes at the same time as Discovery is working with limited resources to comply with other year-end reporting requirements, including annual greenhouse gas reporting and Tier II. With the limited personnel, I have to balance these reporting obligations and the ICR, while continuing to ensure that Discovery's operations are run in an efficient and environmentally responsible manner. We are working on complying with the ICR while also attending to the existing environmental, safety, and health responsibilities.

For these reasons, I respectfully request a 90 day extension, or until May 8, 2017, to respond to Part 1 of the ICR.

Please contact me if you have any questions or would like additional information. I look forward to hearing from you.

Sincerely,

A handwritten signature in black ink that appears to read "S E Garner".

Stan Garner

cc: Ms. Brenda Shine (via email shine.brenda@epa.gov)



Arvine Pipe & Supply Co.

oil field equipment

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January 13, 2017

U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive,
Mail Code: E143-01
Research Triangle Park, NC 27709

Re: Basic Part 1 Operator Survey

Dear Ms. Shine:

Upon receiving the letter from Peter Tsirigotis dated November 14, 2016, post marked December 2, 2016, and received on December 6, 2016, we are hereby requesting an extension of time.

We are a small office of two persons. We feel with the year-end demands by the IRS and the State of Oklahoma, we will not be able to make the deadline required by the EPA. We would appreciate a six month extension of time to complete this request.

Thank you for your consideration in this matter.

Sincerely,

Ron Arvine
President



1708 Topeka Drive □ Norman, Oklahoma 73069 □ 405 / 364-1950 □ FAX: 405 / 364-8870

www.arvinepipe.com





Arvine Pipe & Supply Co.
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Mail Code: E143-01
Research Triangle Park, NC 27709

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Q1 **January Investments L.L.C.**

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January 13, 2017

U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive,
Mail Code: E143-01
Research Triangle Park, NC 27709

Re: Basic Part 1 Operator Survey

Dear Ms. Shine:

Upon receiving the letter from Peter Tsirigotis dated November 14, 2016, post marked December 2, 2016, and received on December 6, 2016, we are hereby requesting an extension of time.

We are a small office of two persons. We feel with the year-end demands by the IRS and the State of Oklahoma, we will not be able to make the deadline required by the EPA. We would appreciate a six month extension of time to complete this request.

Thank you for your consideration in this matter.

Sincerely,



Ron Arvine
President

January Investments L.L.C

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Norman, Oklahoma 73069

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U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
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Research Triangle Park, NC 27709

27709-031099

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P1

C & L OIL AND GAS CORPORATION

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January 13, 2017

U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive,
Mail Code: E143-01
Research Triangle Park, NC 27709

Re: Basic Part 1 Operator Survey

Dear Ms. Shine:

Upon receiving the letter from Peter Tsirigotis dated November 14, 2016, post marked December 2, 2016, and received on December 6, 2016, we are hereby requesting an extension of time.

We are a small office of two persons. We feel with the year-end demands by the IRS and the State of Oklahoma, we will not be able to make the deadline required by the EPA. We would appreciate a six month extension of time to complete this request.

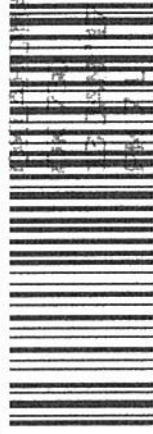
Thank you for your consideration in this matter.

Sincerely,

Ron Arvine
President

C & L OIL AND GAS CORPORATION
1708 Topeka Drive / Norman, Oklahoma 73069

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U.S. Environmental Protection Agency
Attn: Ms. Brenda Shine
109 T.W. Alexander Drive,
Mail Code: E143-01
Research Triangle Park, NC 27709

27709-091099

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Corpus Christi, TX 78401-0999

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Fax: (361) 884-9623

Cert Mail #7011-2970-0002-2332-0281

January 11, 2017

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Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709

**RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR
Primary Facility ID 1635850**

Dear Mr. Tsirigotis:

On or about December 7, 2016, Suemaur Exploration & Production, LLC, received a letter from you dated November 14, 2016, requesting extensive information regarding the above referenced primary Facility. Please note that the letter was addressed to Suemaur Exploration, Inc, a company that is no longer in existence. Future correspondence should be directed to Suemaur Exploration & Production, LLC ("Suemaur").

Suemaur respectfully requests an extension of 60 days to respond to the information collection request ("ICR"). Suemaur is a small independent producer with a limited staff. The information required in the ICR is quite voluminous and the timing for receiving this request caused additional delay since it was received during the holiday season when much of the staff was not available due to vacation time.

Please call or email me if you have any questions and I look forward to your response.

Sincerely,

George G. Clark
Operations Manager

cc: Ms. Brenda Shine cert mail #7011-2970-0002-2332-0298
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive, Mail Code: E143-01
Research Triangle Park, NC 27709



539 N. Carancahua, Suite 1100
Corpus Christi, Texas 78401-0999

RETURN SERVICE
REQUESTED



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Ms. Brenda Shine
Office of Air Quality Planning & Standards
United States Environmental Protection Agency
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Research Triangle Park, NC 27709

2770930310 R777





CountryMark.

0AR-17-000-4437

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Countrymark Cooperative
225 South East Street, Suite 144
Indianapolis, IN 46202-4059
Tel 800.808.3170 | Fax 317.238.8210
www.countrymark.com

Oil and Natural Gas Sector: Information Collection Request

1/10/2017

Mr. Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
United States Environmental Protection Agency
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

RE: Request for Extension of Time to Respond to the Oil and Natural Gas Sector ICR

Facility ID: CountryMark Energy Resources, LLC

Dear Mr. Tsirigotis:

On December 5, 2016, CountryMark Energy Resources, LLC received a letter from EPA dated November 14, 2016. This letter requires our organization to assemble and submit a significant amount of information about CountryMark's operations to EPA. We respectfully request an extension of 60 days to respond to the Information Collection Request (ICR) to complete Part 1 (Operator Survey).

In October 2016, CountryMark submitted six pages of comments to EPA; with two and a half pages of the comments providing information about why the time period was insufficient to complete the ICR in 30 days. We appreciate EPA's willingness to consider our comments and extended the response time from 30 days to 60 days. As we are developing the input to the ICR, we are finding that the 60-day reporting time is still insufficient to provide the requested data.

Over the past five weeks, CountryMark has invested approximately 75 man hours into completing the ICR. During this time, CountryMark has entered all of our tank facilities (approximately 400 facilities) and 950 of 2,500 wells into the data input sheet. We have made substantial progress, but will not be able to enter all of our information into the input sheet within the 60-day period.

In the documentation provided with the ICR, EPA estimated that the average response time to the ICR would be 7.76 hours to complete Part 1 of the survey. To date, we have dedicated almost ten times the estimated man hours to completing the ICR, and we are only 50% complete with the data entry. After data entry is complete, we will spend additional time verifying the input because there are potential criminal penalties associated with incorrect reporting.

At this time of year, our limited staff is consumed with annual reporting activities. A sample of the reports that we complete covers 400 SARA Tier II reports, 450 tax assessments, 320 Class II injection well reports, reserve reports, and production reports for the four states that we operate. Annual reporting typically consumes most of the first five months of the year. This year, we have prioritized the ICR above annual reporting activities. The additional work to complete the ICR has created a noticeable strain on our small organization.

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Thank you for considering our request for additional time to complete the ICR.

A handwritten signature in black ink, appearing to read 'Ch EV', with a long horizontal stroke extending to the right.

Charles E. Venditti, PE, PMP
Manager, Regulatory Compliance

cc: Ms. Brenda Shine

Contact Information

For further information or any questions, please contact Charles E. Venditti Manager, Regulatory Compliance, Countrymark Energy Resources, LLC. 7116 Eagle Crest Blvd, Suite C. Evansville, IN 47715 (office: 812.833.2583; email: Charles.Venditti@CountryMark.com).



CountryMark.

Countrymark Energy Resources, LLC
7116 Eagle Crest Boulevard, Suite C
Evansville, IN 47715

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KY 400
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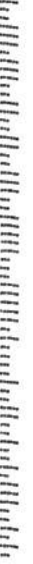


ZIP 47715
041M11270722

FIRST-CLASS MAIL

Mr. Peter Tsiringotis
Director, Sector Policies & Programs Division
US EPA
109 T. W. Alexander Drive
Research Triangle Park, NC 27709

27709-091099



To: ICR[ICR@epa.gov]; Shine, Brenda[Shine.Brenda@epa.gov]
Cc: Pellens, Brian M[Brian.Pellens@crc.com]
From: Champion, Dennis
Sent: Sat 1/21/2017 1:51:51 AM
Subject: RE: Oil and Gas ICR Request
ICR Help Desk 012017.docx

ICR Help Desk,

Thank you for your prompt response to our request. In response to your discussion below, CRC would like to formally request a 60-day extension for the ICR Part 1 and a 90-day extension for the ICR Part 2.

Please note that we received another notification (Facility ID 3001290) on Jan 06, 2017. To facilitate data submission, CRC would prefer the extensions be from the date of the final letter received, in this case January 06, 2017. However, as of today, expected due dates are:

ICR	Receipt Date	Due Date	Extension Due Date	Facility ID
Part 1	Dec 12, 2017	Feb 10, 2017	Apr 11, 2017	1786350
Part 2 (Prod/G&B)	Dec 12, 2017	Jun 10, 2017	Sep 08, 2017	2116000
Part 2 (Proc)	Jan 06, 2017	Jul 05, 2017	Oct 03, 2017	3001290

For any future notifications and/or additional correspondence, please use the following address:

California Resources Corporation

11109 River Run Blvd

Bakersfield, CA 93311

If you have questions or additional information concerning the ICR process, please contact myself as outlined below or Brian Pellens at brian.pellens@crc.com. Your assistance and guidance is appreciated.

(Note: Attached is a Word document containing this correspondence in the event this email message cannot be read.)

DENNIS J. CHAMPION, PE
Manager Air Quality/GHG



11109 River Run Blvd
Bakersfield, CA 93311
P: 661.529.4454
M: 661.331.0118
dennis.champion@crc.com

From: ICR [mailto:ICR@epa.gov]

Sent: Friday, January 20, 2017 6:03 AM

To: Champion, Dennis

Cc: ICR

Subject: RE: Oil and Gas ICR Request

Mr. Champion,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letter.

We can grant you an extension of up to 90 days for Part 2. This brings your total due date to 270 days from the date of receipt of the Part 2 letter.

Please provide me with the Primary Facility IDs/Assigned Facility ICR IDs from your letters and verify your address, so that we can mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Champion, Dennis [mailto:Dennis.Champion@crc.com]

Sent: Thursday, January 19, 2017 8:32 PM

To: ICR <ICR@epa.gov>

Subject: Oil and Gas ICR Request

Importance: High

ICR Help Desk,

California Resources Corporation (CRC) has received several Information Collection Request (ICR) notifications for our oil and gas operations in California. To date, CRC has received nine (9) separate ICR notifications covering all aspects of the ICR Part 1 and 2.

CRC maintains diverse operations throughout California geographically separated across many miles. The ICR request is far beyond routine data collection typically associated with either air quality or GHG reporting activities. Furthermore, the data requested is in a format not conducive to traditional data collection activities.

As you are aware, preparations are currently underway to generate the annual GHG report due to your offices in March. Additionally, in California, there is State GHG reporting due in June.

Ex. 4 - CBI

Ex. 4 - CBI

as a result of the current commodity market.

Our goal is to provide your office with the most accurate data possible. However, considering the breadth of the ICR, CRC believes the timeframe provided is not sufficient to accurately complete the data request. Therefore, we respectfully request a 60-day extension of the Part 1 and Part 2 requests. We feel this extension is necessary to properly address the data requests.

Please contact me if you questions or comments concerning this issue.

DENNIS J. CHAMPION, PE

Manager Air Quality/GHG

11109 River Run Blvd

Bakersfield, CA 93311

P: 661.529.4454

M: 661.331.0118

dennis.champion@crc.com

To: ICR[ICR@epa.gov]
From: Champion, Dennis
Sent: Fri 1/20/2017 1:32:21 AM
Subject: Oil and Gas ICR Request

ICR Help Desk,

California Resources Corporation (CRC) has received several Information Collection Request (ICR) notifications for our oil and gas operations in California. To date, CRC has received nine (9) separate ICR notifications covering all aspects of the ICR Part 1 and 2.

CRC maintains diverse operations throughout California geographically separated across many miles. The ICR request is far beyond routine data collection typically associated with either air quality or GHG reporting activities. Furthermore, the data requested is in a format not conducive to traditional data collection activities.

As you are aware, preparations are currently underway to generate the annual GHG report due to your offices in March. Additionally, in California, there is State GHG reporting due in June.

Ex. 4 - CBI

Ex. 4 - CBI as a result of the current commodity market.

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Please contact me if you questions or comments concerning this issue.

DENNIS J. CHAMPION, PE
Manager Air Quality/GHG



11109 River Run Blvd
Bakersfield, CA 93311
P: 661.529.4454
M: 661.331.0118
dennis.champion@crc.com

To: ICR[ICR@epa.gov]
From: Neil Sisson
Sent: Thur 1/19/2017 10:43:28 PM
Subject: Re: Extension Request Ltr Attached

Thank you
Sent from my iPhone

On Jan 19, 2017, at 3:37 PM, ICR <ICR@epa.gov> wrote:

S. Neil Sisson,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letter. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Thursday, January 19, 2017 3:30 PM
To: ICR <ICR@epa.gov>
Subject: FW: Extension Request Ltr Attached

From: Wildhorse [mailto:wildhorse@swbell.net]
Sent: Thursday, January 19, 2017 2:32 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Neil Sisson <ss>
Subject: Extension Request Ltr Attached

RE: EXTENTION REQUEST

WILDHORSE OIL & GAS CORPORATION Case No.: 1719850

WILDHORSE OPERATING COMPANY Case No.: 1719950; 1720000;1720050

Dear Ms. Shine;

We are herein requesting the 60 Day Extension. We received the I.R.C.'s early December 2016. We are an Independent Lease Operator with three in-house personnel in addition to me, although we have a good start on the 88 wells' survey.

1. December is Christmas Holiday with the family, church and school gatherings and programs all previously scheduled prior to your IRC.
2. January is 1099,W-2 and other required reporting, again all previously scheduled prior to your IRC.
3. We do not believe we have been selected for a #2 IRC after running our well #'s in your US Well ID Match Tool.

For the above reasons we respectfully request the 60 day extension to properly full fill your request.

Our thanks in advance,

S. Neil Sisson, President

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Thur 1/19/2017 8:30:07 PM
Subject: FW: Extension Request Ltr Attached
EPA Extension Request Ltr.doc

From: Wildhorse [mailto:wildhorse@swbell.net]
Sent: Thursday, January 19, 2017 2:32 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Neil Sisson <sns@swbell.net>
Subject: Extension Request Ltr Attached

RE: EXTENTION REQUEST

WILDHORSE OIL & GAS CORPORATION Case No.: 1719850

WILDHORSE OPERATING COMPANY Case No.: 1719950; 1720000;1720050

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3. We do not believe we have been selected for a #2 IRC after running our well #'s in your US Well ID Match Tool.

For the above reasons we respectfully request the 60 day extension to properly full fill your request.

Our thanks in advance,

S. Neil Sisson, President

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Thur 1/19/2017 8:28:02 PM
Subject: FW: Extension

-----Original Message-----

From: [Ex. 6 - Personal Privacy]@yahoo.com [mailto:[Ex. 6 - Personal Privacy]@yahoo.com]
Sent: Thursday, January 19, 2017 2:53 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Extension

I am emailing you on behalf of JADCO ENERGY INC. to ask for an extension on the ICR. [Ex. 4 - CBI]
[Ex. 4 - CBI] This is a monumental
task with the number of people we have. I am working on inputting the data however I feel like we will
need more time to gather the information you are asking.

Thank you.
John Love
JADCO ENERGY INC

Sent from my iPhone

To: ICR[ICR@epa.gov]
From: Troy Kinch
Sent: Thur 1/19/2017 8:53:09 PM
Subject: RE: ICR Extension Request
removed.txt

Thank you for the 60 day, Part 1 extension.

Regards

Troy Kinch

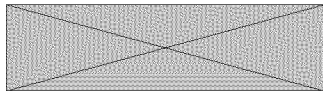
Troy A. Kinch

EHS

Finley Resources, Inc.

817-676-1638

tkinch@finleyresources.com



From: ICR [mailto:ICR@epa.gov]
Sent: Friday, January 13, 2017 10:33 AM
To: Troy Kinch
Subject: Re: ICR Extension Request

Mr. Kinch,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter.

The only samples that are required in Part 2 are for separators that dump into atmospheric storage tanks. If this is a shut in well, then I would assumed that no separators or tanks are available on site.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Friday, January 13, 2017 3:54 PM
To: ICR
Subject: FW: ICR Extension Request

From: Troy Kinch [<mailto:TKinch@finleyresources.com>]
Sent: Friday, January 13, 2017 10:28 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Subject: ICR Extension Request

Good morning Mrs. Shine

I'd like to request an extension on the ICR please. My 60 day due date is scheduled for February 9th; however, I don't think I'll be able to complete the spreadsheet in its entirety due to the extensive wealth of information required and

Ex. 4 - CBI

Ex. 4 - CBI

Ex. 4 - CBI

Also, the well associated with Part 2 of the ICR is not capable of producing; therefore, no sample can be pulled. What are my alternatives?

Thank you for your time in advance.

Troy Kinch

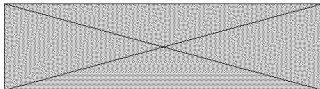
Troy A. Kinch

EHS

Finley Resources, Inc.

817-676-1638

tkinch@finleyresources.com



To: ICR[ICR@epa.gov]
Cc: Linda McKean[linda@corlena.com]; Jeff Chesnut[jeff@corlena.com]; Rob Michelot[rob@corlena.com]
From: Ted Francis
Sent: Thur 1/19/2017 8:17:09 PM
Subject: Request for 60 Day Extension of time to respond to Oil and Natural Gas Sector ICR Facility ID # 1148900

Mr. Peter Tsirigotis

Director, Sector Policies and Programs Division

Office of Air Quality Planning and Standards

United State Environmental Protection Agency

109 T. W. Alexander Drive

Research Triangle Park, NC 27709

RE: Request for 60 Day Extension of time to respond to Oil and Natural Gas Sector ICR
Facility ID 1148900

Corlena Oil Company received your letter dated November 14, 2016, on 12/8/2016. My company is requesting an extension of 60 days to respond to the information collection request ("ICR")

As a result of market condition [Ex. 4 - CBI]
[Ex. 4 - CBI] As you are aware
this information collection requires me to certify to the accuracy of the information provided to
the EPA and subjects me to criminal liability [Ex. 4 - CBI]
[Ex. 4 - CBI] Consequently, I will have to
personally visit each location to insure the information is accurate.

In addition, the timing for response is terrible.

Ex. 4 - CBI

Ex. 4 - CBI

We will be completing them next month and filing all the state required forms and permits. We are also concluding our Fiscal year, and are submitting "IRS" tax forms and 1099's to individual owners.

For the above reasons we respectfully request a 60 day extension to respond to your "ICR".

If this is agreeable and you are willing to grant this extension please contact me at ted@corlena.com or by phone 806-372-5044

Thank You,

Ted Francis, P.E.

Corlena Oil Company –Partner

619 S. Tyler St 210

Amarillo, Texas 79101

Email – ted@corlena.com

Office Phn (806)372-5044

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Thur 1/19/2017 5:17:48 PM
Subject: FW: EOG resources, Inc. Information Collection Request - Oil and Gas Facilities - Request for Extension of Time to Respond
EOG ICR Survey Extension Request.pdf

From: Nick Groves [mailto:Nick_Groves@eogresources.com]
Sent: Thursday, January 19, 2017 10:40 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Subject: EOG resources, Inc. Information Collection Request - Oil and Gas Facilities - Request for Extension of Time to Respond

Ms. Shine

EOG Resources, Inc. (EOG) is requesting a 60-day extension to submit responses to Part 1 of the Information Collection Request (ICR) on oil and gas facilities for the facility IDs listed in the attached document. The content of the letter is included below. A hard copy of the attached will be sent to your attention. Please let me know if you have any questions.

Ms. Brenda Shine

U.S. Environmental Protection Agency

109 T.W. Alexander Drive, Mail Code: E143-01

Research Triangle Park, NC 27709

Re: Information Collection Request - Oil and Gas Facilities - Request for Extension of Time to Respond

Dear Ms. Shine:

EOG Resources, Inc. (EOG) is requesting a 60-day extension to submit responses to Part 1 of the Information Collection Request (ICR) on oil and gas facilities for the facility IDs listed below.

EOG received the first of 14 letters during the week of December 5, 2016 and additional letters over the next two weeks. The requests include both Part 1 and Part 2 for EOG's production operations and Part 2 survey information for EOG's gathering and boosting, natural gas liquid extraction and pipeline operations. These requests require gathering data for EOG operations at over 5,800 sites as well as data for an additional 2,000 sites previously operated by Yates Petroleum and its subsidiaries, which EOG acquired in October, 2016.

The facilities are in multiple operating basins and thousands of data elements are involved to fully meet the reporting obligations. This extensive data gathering and reporting is in addition to numerous mandatory state and federal annual reporting requirements which are due in the same time period (e.g., emissions inventories, Tier II, greenhouse gases, DOT drug and alcohol, PHMSA).

Additionally, since the ICR was received during December, many EOG personnel were out of the office for year-end vacations and the holidays. Staff personnel are currently compiling the year-end reports for the various programs listed above and temporary staff cannot be trained to gather and submit the reports due to the short timeframe for reporting.

For the reasons listed above, EOG requests a 60-day extension for submission of Part 1 for the following facilities:

EOG Resources Incorporated- ICR Facility ID 1219500

EOG Resources, Inc. – ICR Facility ID 3004330

EOG Resources, Inc.- TX- ICR Facility ID 5003680

EOG Resources Y; formerly Yates Petroleum Corporation- ICR Facility ID 1735050 & 2875000

EOG Resources A; formerly Abo Petroleum Corporation (Yates Petroleum subsidiary) – ICR Facility ID 1007250 & 1007200

EOG Resources M; formerly Myco Industries Inc. (Yates Petroleum subsidiary) – ICR Facility ID 1455800 & 1455850

Thank you for your attention to this matter. If you have any questions, please contact me directly. My contact information is listed below.

Sincerely,

Nick Groves

Group Director, EOG Resources, Inc.

EOG Resources, Inc.

713-651-6440

To: ICR[ICR@epa.gov]
From: Daniel Guier
Sent: Thur 1/19/2017 4:37:39 PM
Subject: FW: Oil And Gas ICR - Goldston Oil - ICR Questions

See below for the questions I am still waiting to hear answers for.

Daniel Guier

Production Manager

Goldston Oil Corporation

From: Daniel Guier
Sent: Thursday, January 12, 2017 3:31 PM
To: 'shine.brenda@epa.gov'
Subject: Oil And Gas ICR - Goldston Oil - ICR Questions

Ms. Shine,

Below are my questions regarding the ICR Goldston recently received. Please respond back with answers, or with questions if further explanation is needed to answer any question. Thank you.

Goldston Oil – Facility ID 1262950

- 1) Water & Gas go to one centralized production surface site, and Oil goes to a different site. How to handle that with only being able to pick one “surface side ID” of the centralized production surface site associated with the well?
- 2) Does production equipment need to be accounted for if the well is shut in, equipment (such as tanks, separators, etc.) has been disconnected, and there are no future plans to return that well to production?

- 3) Does a centralized production surface site count if there were 2 wells being produced to that site, now one well is shut in, but we have future plans to return that well to production? Or do we just count both wellbores as well surface sites, but do not include the centralized production site due to only one well producing to it?
- 4) For atmospheric tanks, do we only count oil/condensate tanks in the number? Or do we include water tanks?
- 5) How do you classify a well with no production history? The well was drilled, the well never produced. The well has not been permanently abandoned.
- 6) How to handle equipment where the centralized production surface site is a well surface site. Do we count the flare, separator, tanks, etc on both the centralized production surface site in section 3 and well surface site in section 4? I don't want that equipment to be counted twice.
- 7) How does the operator count when there is a well on a well surface site, and then there are some tanks & a separator closer to the lease road, on a separate site? It is the only well producing to that site, so it is not considered a centralized production surface site is a well surface site. But how does the operator account for both sites?
- 8) How do we handle when the tanks for a well surface site are on a separate well surface site, but that well surface site with the tanks is no longer producing, and has not produced for 15 years? There could be some confusion since the 2 wells were comingled (one of each of the well surface sites mentioned), but now one is shut in.
- 9) Is our surface site subject to the fugitive emission requirements in 40 CFR 60.5397a of subpart 0000a if we only downgraded our compressor from a 600 HP compressor to a 360 HP compressor due to an issue with the 600 HP compressor that was so expensive, it was cheaper to downgrade compressors than fix the issue with our 600 HP.

10) What date is the Goldston ICR due, the date we have received is 12/12/2016, which puts the ICR due 2/10/2017, correct? Also, Goldston requested a 60 day extension, what is the status of that extension?

Daniel Guier

Production Manager

Goldston Oil Corporation

To: ICR[ICR@epa.gov]
From: Tim Sigler
Sent: Wed 1/18/2017 11:54:43 AM
Subject: Re: Extension request for ICR
[sos certificate.pdf](#)

ICR Help Desk,

I apologize for the oversight but when I was looking for the Primary Facility ID number for Transit Energy, Inc. I realize I never received a packet for Transit Energy. There was a Statutory Agent/ Address change for Transit Energy in July of 2016. I spoke with the previous agent and he too did not receive the packet. I have attached a copy of the Statutory Agent Change certificate from the Ohio Secretary of State, if you could please send the packet for Transit Energy to the new address it would be appreciated. Transit Energy, Inc. has a producer owner number of 2771 and Federal ID number 34-1654870.

If it works for the US EPA, moving forward we can align any dates so that they correspond with Sigler Contract Pumping, Inc. The packet was received for Sigler Contract Pumping on Dec. 9, 2016. That would make the original due day Feb. 7, 2017 and the extension due date April 7, 2107.

Please let me know if this is sufficient or if you need anything further from me.

Sigler Contract Pumping, Inc. address is:
3153 W. Smithville Wstrn. Rd.
Wooster, OH 44691
The Primary Facility ID: 1603000.

Thank You,
Tim Sigler

Sigler Contract Pumping, Inc.
Transit Energy, Inc.

On Thu, Jan 12, 2017 at 5:57 PM, ICR <ICR@epa.gov> wrote:

Mr. Sigler,

We can grant Sigler Contract Pumping Inc. and Transit Energy Inc. an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letters. Please note that the clock for the 120 days started on the day you received the letter, **not** the November 14th date that was printed on the letter. Please provide me with the Primary Facility ID from both of the letters, and verify your address, so that we may send you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

[1-888-372-8696](tel:1-888-372-8696)

From: Shine, Brenda
Sent: Thursday, January 12, 2017 6:09 PM
To: ICR
Subject: FW: Extension request for ICR

From: **Ex. 6 - Personal Privacy** [redacted]@gmail.com]
Sent: Thursday, January 12, 2017 12:14 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Extension request for ICR

Dear Ms. Shine,

My name is Tim Sigler. I am the owner and operator of Sigler Contract Pumping, Inc. and Transit Energy, Inc. production companies. I have no staff and have all the year end reports to complete in the first quarter. It would be appreciated if you would extended the deadline for the Information collection request for both Sigler Contract Pumping, Inc. and Transit Energy, Inc. to April 15, 2017. Please advise me if this request is granted. Thank you for your time.

Tim Sigler

To: ICR[ICR@epa.gov]
From: Kenneth Bork
Sent: Wed 1/18/2017 11:17:05 PM
Subject: ICR Extension Request by Sentinel Peak Resources

To Whom It May Concern:

Sentinel Peak Resources California LLC (SPR) requests a one month extension for submittal of our replies to the EPA's Information Collection Requests (ICR). **Ex. 4 - CBI**

Ex. 4 - CBI

Ex. 4 - CBI and have been unable to address the ICR requests at this time. Granting SPR an extension will allow us time to accurately and efficiently gather the necessary data that has been requested.

Thank you, in advance, for your assistance in this matter.

Sincerely,

Kenneth Bork

Senior EHS Advisor

Sentinel Peak Resources

1200 Discovery Drive, Suite #100

Bakersfield, CA. 93309

Cell: **Personal Privacy / Ex. 6**

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Wed 1/18/2017 9:34:29 PM
Subject: FW: clean air act paperwork /Stach enterprises

From: Jenny Stachler [mailto:Ex. 6 - Personal Privacy@yahoo.com]
Sent: Wednesday, January 18, 2017 4:07 PM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: clean air act paperwork /Stach enterprises

Dear Brenda,

This is Russell Stachler with Stach Enterprises.

My Primary Facility ID is 1624700.

I 'm contacting you in regards to the paperwork you sent me.

Due to weather and I am a one one man show. I am still trying to figure this paperwork out. At this time I would like an extension for 90 days. So I can comply with the information you have asked for and also get my taxes done.

Please feel free to contact me at my wife's email Ex. 6 - Personal Privacy@yahoo.com

Thanks again for working with me on this process.

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Tue 1/17/2017 9:21:41 PM
Subject: FW: [SPAM] FW: EPA Extension Request
[Extension Request.pdf](#)

From: Mark Wilson [mailto:mwilson@bayoaksresources.com]
Sent: Tuesday, January 17, 2017 3:15 PM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: [SPAM] FW: EPA Extension Request

From: Laura Phillips [mailto:lphillips@bayoaksresources.com]
Sent: Tuesday, January 17, 2017 2:07 PM
To: Mark Wilson
Subject: EPA Extension Request

Attn: Peter Tsirigotis

U.S. Environmental Protection Agency

109 T.W. Alexander Drive, Mail Code: E143-01

Research Triangle Park, NC 27709

Re: Bay Oaks Resources LLC

3301 South 70th Street, Suite B

Fort Smith, AR 72903

Dear Mr. Tsirigotis,

Bay Oaks Resources LLC received the recent Information Collection Request (ICR) from the EPA. This ICR consists of Part 1 "Operator Survey" and Part 2 "Facility Survey". This ICR was received by Bay Oaks Resources LLC on December 12, 2016.

Bay Oaks Resources is a small independent operator with a small staff and we are still finalizing our normal 2016 year-end reporting and other obligations which were already delayed due to weather and holiday vacations. Ex. 4 - CBI

Ex. 4 - CBI and this has added additional duties for our staff. We will have to retain an outside consultant to be able to comply with this request which will increase the preparation time.

We hereby request that the EPA grant Bay Oaks Resources LLC an extension until April 12, 2017 to submit the 2 surveys to the EPA per your letter to Bay Oaks Resources LLC, dated November 12, 2016.

Should you have any questions concerning this request for an extension of time please contact me at our office (479) 242-4518 or on my mobile phone Ex. 6 - Personal Privacy or by email at mwilson@bayoaksresources.com.

I appreciate your consideration in this matter.

Sincerely,

Mark Wilson

President



To: ICR[ICR@epa.gov]
From: Greenslade, Bob
Sent: Tue 1/17/2017 8:31:54 PM
Subject: RE: Facility ID 1531350 - Request for Confirmation re Extension

Hello –

I am following up on the status of the extension letter noted in the e-mail chain below. Quail Creek has not yet received a letter.

Best regards,

Bob Greenslade | Counsel

Norton Rose Fulbright US LLP

Tabor Center, 1200 17th Street, Suite 1000, Denver, Colorado 80202-5835

Fulbright Tower, 1301 McKinney, Suite 5100, Houston, Texas 77010-3095
Tel +1 303 801 2747 | Fax +1 303 801 2777

bob.greenslade@nortonrosefulbright.com

Licensed in Colorado and Texas

NORTON ROSE FULBRIGHT

Law around the world

nortonrosefulbright.com

From: Greenslade, Bob
Sent: Wednesday, January 04, 2017 3:43 PM
To: 'ICR'

Subject: RE: Facility ID 1531350 - Request for Confirmation re Extension

To whom it may concern:

The address for Quail Creek should be:

• 10000 Memorial Drive, Ste. 770, Houston, TX 77024.

This differs from the e-mail below, which states an incorrect address of 1000 Memorial Drive.

Best regards,

Bob Greenslade | Counsel

Norton Rose Fulbright US LLP

Tabor Center, 1200 17th Street, Suite 1000, Denver, Colorado 80202-5835

Fulbright Tower, 1301 McKinney, Suite 5100, Houston, Texas 77010-3095
Tel +1 303 801 2747 | Fax +1 303 801 2777

bob.greenslade@nortonrosefulbright.com

Licensed in Colorado and Texas

NORTON ROSE FULBRIGHT

Law around the world

nortonrosefulbright.com

From: ICR [<mailto:ICR@epa.gov>]
Sent: Wednesday, January 04, 2017 6:53 AM
To: Greenslade, Bob
Subject: Re: Facility ID 1531350 - Request for Confirmation re Extension

Mr. Greenslade,

We will mail a letter granting the requested 60 day extension for the Quail Creek Oil Corporation (Primary ID: 1531350) by the end of this week. We have the following address for Quail Creek: 1000 Memorial Drive, Ste. 770, Houston, TX 77024. If this is not the correct address, please provide us with the correct information.

Thank you.

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

From: Greenslade, Bob <bob.greenslade@nortonrosefulbright.com>
Sent: Tuesday, January 3, 2017 6:53 PM
To: ICR
Subject: Facility ID 1531350 - Request for Confirmation re Extension

To whom it may concern –

The purpose of this message is to request confirmation, by reply e-mail, that a 60-day extension to the Part 1 Oil and Gas Information Collection Request ("ICR") deadline has been granted for Quail Creek Oil Corporation (primary Facility ID 1531350).

As discussed by telephone with Janice Godfrey on January 3, 2017, Quail Creek Oil Corporation requests an extension because it is a very small company with limited administrative resources. The company received the ICR on December 12, 2016. At the conclusion of the call, Ms. Godfrey stated that she would enter a 60-day extension for Quail Creek and that written confirmation could be requested.

In light of the above, I am requesting a return e-mail confirming that a 60-day extension has been entered for Quail Creek Oil Corporation. If you have any questions or need any additional information, please do not hesitate to contact me.

Best regards,

Bob Greenslade | Counsel
Norton Rose Fulbright US LLP
Tabor Center, 1200 17th Street, Suite 1000, Denver, Colorado 80202-5835, United States
Tel +1 303 801 2747 | Fax +1 303 801 2777
bob.greenslade@nortonrosefulbright.com

NORTON ROSE FULBRIGHT

Law around the world
nortonrosefulbright.com

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To: ICR[ICR@epa.gov]
From: Toomey Oil Co.
Sent: Tue 1/17/2017 7:24:25 PM
Subject: Re: ICR Extension Request for Toomey Oil Company

Thank you so much! We really appreciate it.
Best,
Elisabeth

TOOMEY OIL CO., INC.

PO Box 1090 Tulsa, OK 74101 Phone: 918-583-1166 Fax: 918-583-1468

On Tue, Jan 17, 2017 at 12:43 PM, ICR <ICR@epa.gov> wrote:

Ms. Blue,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letter. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

[1-888-372-8696](tel:1-888-372-8696)

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Toomey Oil Co. [<mailto:office@toomeyoil.com>]
Sent: Tuesday, January 17, 2017 11:16 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: ICR Extension Request

Hello Ms. Shine,

Please find attached a formal extension request letter which has also been sent via postal service.

Toomey Oil is a very small family operation. We are in the process of compiling the requested information but have realized we will be unable to appropriately and accurately acquire all the data prior to the original deadline.

I have provided further detail in the letter. If you could please grant this request we would be most grateful.

Best,

Elisabeth Blue

918-583-1166

TOOMEY OIL CO., INC.

PO Box 1090 Tulsa, OK 74101 Phone: 918-583-1166 Fax: 918-583-1468

To: courtneyt@trexexploration.com[courtneyt@trexexploration.com]
Cc: ICR[ICR@epa.gov]
From: ICR
Sent: Tue 1/17/2017 7:23:21 PM
Subject: Re: ICR Part 1 Survey Extension Request for Trey Exploration, Inc.

Courtney TenBarge,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letter. We will mail you a confirmation letter.

If you need assistance with completing the ICR, please contact the ICR Phone Bank at 888-372-8696, which is staffed Monday through Friday from 9:00 am until 6:00 pm (EST).

Thank you.

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Courtney TenBarge <courtneyt@trexexploration.com>
Date: January 17, 2017 at 9:17:31 AM EST
To: tsirigotis.peter@epa.gov
Subject: ICR Part 1 Survey

Mr. Tsirigotis,

Trey Exploration, Inc. is requesting an extension for the ICR Part 1 “operator survey” that was sent to us on November 14th, 2016 and received by us on December 2, 2016. Since the price of oil has decreased substantially,

Ex. 4 - CBI

Therefore, we are having a difficult time with the 60 day time limit to complete the very in-depth, time-consuming ICR Part 1 survey. Along with the ICR we are having to complete all year-end items and the taxes due to the IRS with a new and earlier deadline. To complete all these tasks along with our daily activities

Ex. 4 - CBI

Ex. 4 - CBI has been extremely challenging, therefore we would truly appreciate an extension to be able to complete the ICR Part 1 in a manner where we have enough time to review and correctly complete the survey. We realize the importance of this to the EPA, so we want to make sure we have the time to assess everything correctly and complete it accurately.

Our office staff have been researching and reading the requirements and instructions since we received the paperwork, and it has taken them longer than expected trying to figure out exactly what needs to be done. The time that has been spent for the office staff to organize what all is needed from the field worker/engineer has taken longer than anticipated for something with a short 60 day time frame. Therefore, the extension would help in that regard to allow us adequate time to make sure we are doing everything that is required of us.

Thank you for your time and allowing us to have the extension to complete this survey to the best of our ability for the information the EPA is needing.

Sincerely,

Courtney TenBarge

--

Courtney TenBarge
Office Manager
Trey Exploration, Inc.
P.O. Box 906
Newburgh, IN 47629
(812) 402-0323 - Office
(812) 425-1520 - Fax

To: jstegman@srwinc.com[jstegman@srwinc.com]
Cc: ICR[ICR@epa.gov]
From: ICR
Sent: Tue 1/17/2017 6:47:03 PM
Subject: Re: ICR extension

Mr. Stegman,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letters. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Tuesday, January 17, 2017 5:02 PM
To: ICR
Subject: FW: ICR extension

From: John Stegman [mailto:jstegman@srwinc.com]
Sent: Tuesday, January 17, 2017 11:31 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: ICR extension

Hello Brenda,

SRW Inc. wishes to request an extension in completing the EPA methane emission ICR survey.
Ex. 4 - CBI and have found it difficult to fully
complete in the time frame set. If we could receive an additional 90 days to complete it would be
appreciated. Note our primary facility ID is 1623500.

Thank you

John Stegman

SRW Inc.

Superintendent – Gaylord

989-732-8884

989-732-8068 - FAX

To: office@toomeyoil.com[office@toomeyoil.com]
Cc: ICR[ICR@epa.gov]
From: ICR
Sent: Tue 1/17/2017 6:43:46 PM
Subject: Re: ICR Extension Request for Toomey Oil Company

Ms. Blue,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letter. We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Toomey Oil Co. [mailto:office@toomeyoil.com]
Sent: Tuesday, January 17, 2017 11:16 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: ICR Extension Request

Hello Ms. Shine,

Please find attached a formal extension request letter which has also been sent via postal service.

Toomey Oil is a very small family operation. We are in the process of compiling the requested information but have realized we will be unable to appropriately and accurately acquire all the data prior to the original deadline.

I have provided further detail in the letter. If you could please grant this request we would be most grateful.

Best,

Elisabeth Blue

918-583-1166

TOOMEY OIL CO., INC.

PO Box 1090 Tulsa, OK 74101 Phone: 918-583-1166 Fax: 918-583-1468

To: [Ex. 6 - Personal Privacy]@AOL.COM [Ex. 6 - Personal Privacy]@AOL.COM]
Cc: ICR[ICR@epa.gov]
From: ICR
Sent: Tue 1/17/2017 6:37:15 PM
Subject: Re: EPA INFORMATION COLLECTION REQUEST Extension Request

Mr. Gaines,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the Part 1 letters.

We can grant you an extension of up to 90 days for Part 2. This brings your total due date to 270 days from the date of receipt of the Part 2 letters.

We will mail you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Tuesday, January 17, 2017 5:02 PM
To: ICR
Subject: FW: EPA INFORMATION COLLECTION REQUEST

From: DOUG GAINES [mailto:[Ex. 6 - Personal Privacy]@AOL.COM]
Sent: Tuesday, January 17, 2017 11:09 AM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>

Subject: EPA INFORMATION COLLECTION REQUEST

To Whom It May Concern:

We are in receipt of the above referenced information request for the following facilities:

- 1) Gaines Operating, LLC, Facility #1249250;
- 2) Fossil Energy, Inc., Facility #1240000;
- 3) Fitzgerald Production Co., Facility #123400;
- 4) R. L. Davis, Facility #1536650;
- 5) Caddo Pine Island Oil & Hist. Soc., Facility #1103350

We are herein requesting an extension until March 1, 2017, to complete Part 1 of the survey and an extension until July 1, 2017 to complete Part 2 of the survey. We are requesting these extensions due to the volume of information requested and the lack of personnel available to complete the survey. Our industry has experience difficult financial times over the last two years and

Ex. 4 - CBI

Ex. 4 - CBI The information requested, and in particular, the Longitude and Latitude of each well and facility is not information we have on file and will require onsite surveys to collect this information. In addition we have yearend obligations regarding our IRS requirements and forms due and simply do not have the personnel necessary to meet the pending deadline for completing the EPA survey.

Your help and cooperation in granting these extensions will be greatly appreciated.

Doug Gaines

President/Manager

To: ICR[ICR@epa.gov]
From: Hunt, Virginia
Sent: Tue 1/17/2017 12:21:53 PM
Subject: FW: Extension

Virginia L. Hunt

Administrative Specialist

U.S. EPA/OAR/OAQPS/SPPD/RCG

109 T.W. Alexander Drive (E143-01)

RTP, NC 27711

919-541-0832

Office hours 6:30am – 3:00pm EST

From: Johnson, Tanya **On Behalf Of** Tsirigotis, Peter
Sent: Friday, January 13, 2017 2:04 PM
To: Lassiter, Penny <Lassiter.Penny@epa.gov>
Cc: Hunt, Virginia <Hunt.Virginia@epa.gov>
Subject: FW: Extension

From: Ryan Haggerty [<mailto:ryan@thebff.net>]
Sent: Friday, January 13, 2017 11:52 AM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Extension

Good morning,

Our company received a letter in request for an ICR. We are glad to provide this to you, however I will need an extension on the 60 day period. We are a very small family office and with a small staff, it is going to take me a bit longer to gather the appropriate information. I am working with a specialist to help compile the information and get it to you in the correct manner. However, would you please allow an extended period of time? Thank you.

-Ryan Haggerty

Ryan M. Haggerty

Investment Manager

FIELDS

Estate of Bert Fields, Jr.
Fields Oil & Gas Company
LLC
Fields Cattle Company LLC

12900 Preston Road, Suite 1115
Dallas, Texas 75230

Direct: 469-904-7521

Cell: Ex. 6 - Personal Privacy

ryan@thebff.net

To: ICR[ICR@epa.gov]
From: David Pauly
Sent: Mon 1/16/2017 9:21:14 PM
Subject: ICR Request Section 114 CAA, Operator Survey

Pickrell Drilling Company

100 S. Main St Ste 505

Wichita, KS 67202

Ms. Brenda Shine

United States Environmental Protection Agency

109 T.W. Alexander Drive, Mail Code:E142-01

Research Triangle Park, NC 27709

Dear Ms. Shine,

Pickrell Drilling Company is requesting a 60 day extension to complete part1 of the operator survey. The initial request was received December 13, 2016.

The 60 days of time allotted to prepare this information falls over the Christmas and New Year holiday season and scheduled vacation time during the holiday season.

Personal Privacy / Ex. 6

Pickrell has close to 300 wells to report and the form in which this is to be reported is taking more time than we expected. We also have a limited staff due to the down

turn in the industry.

Very Truly,

David Pauly

Engineer

Office 316-262-8427

Cell Personal Privacy / Ex. 6

To: ICR[ICR@epa.gov]
From: Midwestern Exploration Co.
Sent: Mon 1/16/2017 8:51:36 PM
Subject: REQUEST FOR TIME EXTENSION RE."EPA INFORMATION COLLECTION REQUEST
Dated Nivember 14,2016" FOR FACILITY ID #1437500

Gentlemen:

This is to request a 60 day extension for the submittal of the Part 1 survey information requested in the subject EPA letter. I am a one man office and operate wells in two (2) states and multiple counties within those states. More time is needed to collect, assimilate and submit the requested information than the 60 days set out as required in the subject letter. THIS REQUEST IS FOR FACILITY ID # 1437500.

Your kind consideration of my request for the 60 DAY EXTENSION will be greatly appreciated.

Thank you for your consideration.

Yours Truly,

Dale J. Lollar

President

Midwestern Exploration Co.

3500 S. Boulevard, Suite 2B

Edmond, Oklahoma 73013

Office 405-340-4300

Fax 405-340-4301

midwesternexpco@sbcglobal.net

To: ICR[ICR@epa.gov]; Shine, Brenda[Shine.Brenda@epa.gov]
From: Aaron Wilson
Sent: Mon 1/16/2017 7:32:28 PM
Subject: ICR Extension Request - Facility ID 1494400, Parsley Energy Operations, LLC
removed.txt

Ms. Brenda Shine,

Parsley Energy Operations, LLC received a letter from Mr. Peter Tsirigotis on **December 8, 2016**. The letter requests extensive information regarding our wells and facilities. I would like to respectfully request an extension of **60 days to respond to Part 1 and an extension of 90 days to respond to Part 2** of the information collection request.

We have limited staff who will be required to obtain the necessary information on over 900 wells spread out over hundreds of square miles. Additionally, the request arrived during the holiday season when many of our staff members are on leave. Finally, the timing of the request also coincides with other annual reporting tasks that these staff members are also responsible for.

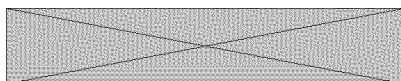
We are working diligently to accurately comply with the ICR, while also attending to our existing environmental, safety, and health responsibilities.

If possible, please indicate in your response when our responses for Part 1 and Part 2 are due (Facility ID 1494400, Parsley Energy Operations, LLC).

Thank you,

Aaron B. Wilson, Jr., P.G.

Environmental Manager



500 W Texas, Suite 200

Midland, TX 79701

432-704-2577 (office)

Ex. 6 - Personal Privacy (cell)

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Tue 1/17/2017 5:02:26 PM
Subject: FW: ICR Extension Request
ICR Extension Request Letter.PDF

From: Toomey Oil Co. [mailto:office@toomeyoil.com]
Sent: Tuesday, January 17, 2017 11:16 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: ICR Extension Request

Hello Ms. Shine,

Please find attached a formal extension request letter which has also been sent via postal service.

Toomey Oil is a very small family operation. We are in the process of compiling the requested information but have realized we will be unable to appropriately and accurately acquire all the data prior to the original deadline.

I have provided further detail in the letter. If you could please grant this request we would be most grateful.

Best,

Elisabeth Blue

918-583-1166

TOOMEY OIL CO., INC.

PO Box 1090 Tulsa, OK 74101 Phone: 918-583-1166 Fax: 918-583-1468

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Tue 1/17/2017 5:02:05 PM
Subject: FW: ICR extension

From: John Stegman [mailto:jstegman@srwinc.com]
Sent: Tuesday, January 17, 2017 11:31 AM
To: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: ICR extension

Hello Brenda,

SRW Inc. wishes to request an extension in completing the EPA methane emission ICR survey.
[Ex. 4 - CBI] and have found it difficult to fully complete in the time frame set. If we could receive an additional 90 days to complete it would be appreciated. Note our primary facility ID is 1623500.

Thank you

John Stegman

SRW Inc.

Superintendent – Gaylord

989-732-8884

989-732-8068 - FAX

To: ICR[ICR@epa.gov]
From: Shana McNeal
Sent: Fri 1/13/2017 9:35:52 PM
Subject: RE: Texland Petroleum, L.P. ICR Request

Thank you so much. What about for Part 2?

Thanks,

Shana McNeal

From: ICR [mailto:ICR@epa.gov]
Sent: Friday, January 13, 2017 3:26 PM
To: Shana McNeal
Cc: ICR
Subject: RE: Texland Petroleum, L.P. ICR Request

Shana McNeal,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. We will mail you a confirmation letter.

Yes, you may use 1657500 to report all of your wells. I will make a note in my records that 1657550 is a duplicate.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Friday, January 13, 2017 3:36 PM
To: ICR <ICR@epa.gov>
Subject: FW: Texland Petroleum, L.P. ICR Request
Importance: High

From: Shana McNeal [<mailto:smcneal@texpetro.com>]
Sent: Friday, January 13, 2017 3:29 PM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Texland Petroleum, L.P. ICR Request
Importance: High

Good Afternoon,

I have attached a letter to request an extension regarding Part 1 and Part 2 of the ICR. Texland is a small operating company and we only have one regulatory person that is able to work on the ICR request. Again, please see letter attached and let me know if we our granted approval along with any new due dates. Also, we were mailed two packets with two different Facility ID # 1657550 and 1657500. We are just one company and that is the Texland Petroleum, L.P. Our New Mexico (Hobbs) follows under the same name. Can I just use the 1657500 ID to represent both Texas and New Mexico on the same spreadsheet? Please, let me know.

Thanks so much,

Shana McNeal

Regulatory Analyst

Texland Petroleum

817-900-1222 smcneal@texpetro.com

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Fri 1/13/2017 8:54:10 PM
Subject: FW: Oil and Gas Information Collection Request

From: Zach Keepes [mailto:zach@zanetisoil.com]
Sent: Friday, January 13, 2017 3:52 PM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>
Cc: Christopher Zanetis <Chris@zanetisoil.com>; Clint Witsman <Clint@zanetisoil.com>
Subject: Oil and Gas Information Collection Request

Good afternoon,

Zanetis Oil Company, LLC received the ICR from the United States Environmental Protection agency in the first week of December, 2016. At this time we would like to ask for a 60 day extension for all parts included. It is the company's intention to comply with all information requested.

Ex. 4 - CBI

Ex. 4 - CBI

We are also still in the process of acquiring well files and information on properties purchased in mid to late 2016. The 60 day extension would allow us the time to gather the needed information to complete the ICR. If there is anything further we can provide, please contact us via email.

Regards,

Zach Keepes

Geologist

Zanetis Oil Company, LLC

618.262.1601

zach@zanetisoil.com

To: ICR[ICR@epa.gov]
From: Shine, Brenda
Sent: Fri 1/13/2017 8:35:58 PM
Subject: FW: Texland Petroleum, L.P. ICR Request
20170113141323220.pdf

From: Shana McNeal [mailto:smcneal@texpetro.com]
Sent: Friday, January 13, 2017 3:29 PM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>; Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Texland Petroleum, L.P. ICR Request
Importance: High

Good Afternoon,

I have attached a letter to request an extension regarding Part 1 and Part 2 of the ICR. Texland is a small operating company and we only have one regulatory person that is able to work on the ICR request. Again, please see letter attached and let me know if we our granted approval along with any new due dates. Also, we were mailed two packets with two different Facility ID # 1657550 and 1657500. We are just one company and that is the Texland Petroleum, L.P. Our New Mexico (Hobbs) follows under the same name. Can I just use the 1657500 ID to represent both Texas and New Mexico on the same spreadsheet? Please, let me know.

Thanks so much,

Shana McNeal

Regulatory Analyst

Texland Petroleum

817-900-1222 smcneal@texpetro.com

To: ICR[ICR@epa.gov]
From: Alan Thrower
Sent: Fri 1/13/2017 8:06:06 PM
Subject: ICR

Gentlemen:

My Company hereby requests an extension of time in order to submit the requested data per your letter dated November 14, 2016. With the delivery of the letter during the holiday season, our limited full time office personnel and recent weather that caused office closure, we most likely will not have time to comply with your 60 day deadline. As I am sure you have heard from other Operators, we have a very heavy workload in the month of December as we process year end data for many partners and contractors.

I have contracted with a third party to put this information package together and they assure me they are close to having all of the necessary information gathered and are in the process of putting in the correct form for submittal.

Thanking you in advance for your consideration.

Sincerely,

ALAN THROWER
CO-MANAGER

REDLAND RESOURCES, LLC
FACILITY ID 1549000
e-GGRT INVITATION CODE WDAK-DLB8
6001 NW 23RD STREET
OKLAHOMA CITY, OK 73127

To: ICR[ICR@epa.gov]
From: Ryan Haggerty
Sent: Fri 1/13/2017 7:18:41 PM
Subject: RE: Extension

I apologize, the address you have on file is

11835 Preston Rd

Dallas, TX 75230.

However, we have moved to a new address shown below. Thank you.

Ryan M. Haggerty

Investment Manager

FIELDS

Estate of Bert Fields, Jr.
Fields Oil & Gas Company
LLC
Fields Cattle Company LLC

12900 Preston Road, Suite 1115
Dallas, Texas 75230

Direct: 469-904-7521

Cell: Ex. 6 - Personal phone

ryan@thebff.net

From: Ryan Haggerty
Sent: Friday, January 13, 2017 1:13 PM
To: 'ICR' <ICR@epa.gov>
Subject: RE: Extension

Thank you. Primary Facility ID is 1231450

From: ICR [<mailto:ICR@epa.gov>]
Sent: Friday, January 13, 2017 11:17 AM
To: Ryan Haggerty <ryan@thebff.net>
Subject: RE: Extension

Mr. Haggerty,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the primary facility ID from your letter, and verify your address, so that we may send you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Friday, January 13, 2017 12:04 PM
To: ICR <ICR@epa.gov>
Subject: FW: Extension

From: Ryan Haggerty [<mailto:ryan@thebff.net>]
Sent: Friday, January 13, 2017 11:52 AM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Extension

Good morning,

Our company received a letter in request for an ICR. We are glad to provide this to you, however I will need an extension on the 60 day period. We are a very small family office and with a small staff, it is going to take me a bit longer to gather the appropriate information. I am working with a specialist to help compile the information and get it to you in the correct manner. However, would you please allow an extended period of time? Thank you.

-Ryan Haggerty

Ryan M. Haggerty

Investment Manager

FIELDS

Estate of Bert Fields, Jr.
Fields Oil & Gas Company
LLC
Fields Cattle Company LLC

12900 Preston Road, Suite 1115
Dallas, Texas 75230

Direct: 469-904-7521

Cell: Ex. 6 - Personal phone

ryan@thebff.net

To: ICR[ICR@epa.gov]
From: Ryan Haggerty
Sent: Fri 1/13/2017 7:14:37 PM
Subject: RE: Extension

Thank you. Primary Facility ID is 1231450

From: ICR [mailto:ICR@epa.gov]
Sent: Friday, January 13, 2017 11:17 AM
To: Ryan Haggerty <ryan@thebff.net>
Subject: RE: Extension

Mr. Haggerty,

We can grant you an extension of up to 60 days for Part 1. This brings your total due date to 120 days from the date of receipt of the letter. Please provide me with the primary facility ID from your letter, and verify your address, so that we may send you a confirmation letter.

Thank you,

ICR Help Desk

US Environmental Protection Agency

ICR@epa.gov

1-888-372-8696

Oil and Gas ICR Resources Website - <http://bit.ly/ICRresources>

From: Shine, Brenda
Sent: Friday, January 13, 2017 12:04 PM
To: ICR <ICR@epa.gov>
Subject: FW: Extension

From: Ryan Haggerty [<mailto:ryan@thebff.net>]
Sent: Friday, January 13, 2017 11:52 AM
To: Tsirigotis, Peter <Tsirigotis.Peter@epa.gov>
Cc: Shine, Brenda <Shine.Brenda@epa.gov>
Subject: Extension

Good morning,

Our company received a letter in request for an ICR. We are glad to provide this to you, however I will need an extension on the 60 day period. We are a very small family office and with a small staff, it is going to take me a bit longer to gather the appropriate information. I am working with a specialist to help compile the information and get it to you in the correct manner. However, would you please allow an extended period of time? Thank you.

-Ryan Haggerty

Ryan M. Haggerty

Investment Manager

FIELDS

Estate of Bert Fields, Jr.
Fields Oil & Gas Company
LLC
Fields Cattle Company LLC

12900 Preston Road, Suite 1115
Dallas, Texas 75230

Direct: 469-904-7521

Cell: Ex. 6 - Personal phone

ryan@thebff.net

December 20, 2016

Peter Tsirigotis
Director, Sector Policies and Programs Division
Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Mail Drop: 6101A
Research Triangle Park, North Carolina 27711

**Re: Request to Extend ICR Reporting Due Dates
Southwestern Energy Part 1 Surveys
Southwestern Energy Part 2 Surveys**

Dear Mr. Tsirigotis:

Southwestern Energy is submitting this letter to request an extension to the reporting timeline for the "Information Collection Effort for Oil and Gas Facilities" ("ICR") Section 114 letters that we recently received. We understand the importance of the information requested in the ICR and support the agencies collection of the ICR data. However, we believe that additional time is warranted to assure that we can properly collect and verify the information prior to submittal to the EPA.

Southwestern Energy is one of the largest producers of natural gas in the lower 48 states. We own/operate over 6,000 wells located in Arkansas, Colorado, Louisiana, Pennsylvania and West Virginia. Each of these wells is subject to the ICR Part 1 survey. We are subject to the ICR Part 2 survey for 30 of our well sites. We also are subject to the ICR Part 2 survey for one of the gathering system pipelines that our production company operates (as determined by the Random Tool Generator).

Southwestern Energy also operates gas gathering and booster stations in Arkansas and Pennsylvania under our midstream operations. We are subject to the ICR Part 2 survey for 6 of our gathering and booster stations.

We received the Section 114 letters by certified mail for both our Production and Midstream (Gathering and Boosting) operations on December 10, 2014. Based on the prescribed 60-day timeline for the Part 1 surveys, the submittal date would be February 8, 2017. Based on the prescribed 180-day timeline for the Part 2 surveys, the submittal date would be May 8, 2017.

Southwestern Energy is respectfully requesting a June 30, 2017 submittal date for both our ICR Part 1 surveys (Production) and Part 2 surveys (Production, Gathering and Booster Pipelines, Gathering and Booster Stations). Our request is based on multiple issues, with some of the key issues outlined below:

$\frac{R^2}{A} \rightarrow V^+$

- Southwestern Energy will need to complete the Part 1 survey for over 6,000 wells. Although the Part 1 survey is limited in scope/detail, it still requires significant internal systems, communications and resources to compile the requested data. As an example, the Part 1 survey will require input from our Production Analyst, Engineering, Operations, and Environmental staff. Then the data will need to be aggregated and manually entered into the Part 1 survey sheet provided by the EPA as we will need to select the proper “drop down” selections in many of the data fields on a well by well basis. We simply do not see 60-days (including holidays and vacation) as adequate time to complete this task.
- Southwestern Energy will need to complete the Part 2 survey for 30 of our well sites, 1 of our gathering and booster line “counties”, and 6 of our gathering and booster facilities. Although not nearly as many “facilities” are subject to the Part 2 survey as the Part 1 survey, the data elements including items such as component counts, measurements, sampling, and detail design data are much more extensive. Similar to the Part 1 survey, the Part 2 survey will require significant internal systems, communications, and resources to compile the requested data. In addition, we will need to engage with external parties (e.g. engine lease companies, equipment manufacturers) to obtain requested data. As with the Part 1 survey, the Part 2 survey will need to be aggregated and manually entered into the Part 2 survey sheet provided by EPA as we will need to select the proper “drop down” selections in many of the data fields on a well by well basis. The Part 2 survey will then need to be electronically uploaded via EPA eGGRT.
- In addition to the data acquisition, compilation, and report aggregation tasks, Southwestern Energy also needs time to review and validate that the information is correct for both the Part 1 and Part 2 surveys before submittal to the EPA. We recognize that this data needs to be as correct as possible for the agencies intended use.
- We acknowledge that the EPA communicated frequently throughout the ICR process. However, there were many changes that occurred to the Part 1 survey and Part 2 survey through their final issuance. These changes, although generally beneficial, still require us to review and confirm interpretations, and possibly establish protocols (e.g. sampling and measurement) before we can provide internal guidance as to the final data that is being requested and how it needs to be obtained.
- The ICR Part 1 and Part 2 surveys appear to be based on “calendar-days” and not “business-days”. This has significant impact to our resources (personnel) **Ex. 4 - CBI** Furthermore, the Section 114 letters were not issued until the busy Thanksgiving-Hanukah-Christmas season when our personnel enjoy holidays off and vacations (further limiting our “effective days” to complete the surveys). Even if the intent is to be based on “business-days”, we still see the need for extended timelines.
- The time commitment to complete the Part 1 and Part 2 surveys will have significant impact to our limited resources. In our current commodity priced environment, **Ex. 4 - CBI**

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Ex. 4 - CBI

The resources needed to complete the Part 1 and Part 2 surveys will also need to complete their normally assigned duties during a very busy time of the year. We had commented on the significant resource burdens in our comment letter dated October 28, 2016 (attached).

- Finally, we believe that extending the deadlines (especially for Part 1 surveys) will allow us to check the Part 1 survey information against our 40 CFR Part 98 Subpart W information (report filing March 31, 2017).

In order to provide more accurate information, while allowing our staff to also work on their normally assigned duties, and based on the issues outlined above, we are respectfully request a June 30, 2017 submittal date for Southwestern Energy's Part 1 and Part 2 surveys.

If you have questions, please contact me at douglas_jordan@swn.com or 832-796-7628.

Sincerely,

Ex. 6 - Personal Privacy

Douglas Jordan

Director, Corporate Environmental Programs

Attachment – SWN, Comments on Proposed Information Collection Request for Oil and Gas Facilities, October 28, 2016 submitted via e-filing at www.regulations.gov.



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Corporate Office
P.O. Box 12359
Spring, Texas 77391-2359
www.swn.com

October 28, 2016

Via e-filing at www.regulations.gov

U.S. Environmental Protection Agency
EPA Docket Center
Mailcode-28221T
Attention: Docket ID No. EPA-HQ-OAR-2016-0204
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Re: Comments on Proposed Information Collection Request for Oil and Gas Facilities

Dear Docket Clerk:

Southwestern Energy (SWN) appreciates this opportunity to submit comments on the notice of proposed Information Collection Request for Oil and Gas Facilities as posted in the Federal Register on June 3rd and the second draft on September 29th, 2016

SWN is currently the third largest producer of natural gas in the lower 48 United States. We are an independent energy company primarily engaged in natural gas and crude oil exploration, development, and production. We also operate midstream services focused on natural gas gathering and marketing. As an oil and gas sector company, the Information Collection Request and potential future regulations on existing sources will significantly affect our operations.

SWN understands and supports the need for better factual information regarding the oil and gas sector operations as a prelude to considering and or developing regulations for existing sources. We therefore understand and support the Information Collection Request which may provide EPA with better factual information. However, we believe that the Information Collection Request imposes an undue burden on the oil and gas sector in the manner and timing in which it is being implemented.

Part 1 ICR Survey Timelines and Resource Estimates

We recommend that EPA extends a more reasonable reporting timeline for the Part 1 surveys which will allow operators adequate time to compile and report better factual and more accurate data.

The proposed ICR requiring Part 1 surveys to be due within 30-days of request is an unreasonably short response time. In the ICR Supporting Statement, EPA estimates that the Part 1 survey will require approximately 7.76 hours per facility (aka well pad) to complete. Assuming that 7.76 hours is a fair assessment of time to complete each Part 1 survey, the resource impacts to SWN are approximately 19,400 hours for our Production Operations. Furthermore, assuming that SWN (and other companies) are given 30 "business" days to complete the Part 1 survey, and assuming a standard work hour day of 8

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hours, which is equivalent to 240 hours. This means in order to meet a 30 day timeline for Part 1 surveys, SWN would need to commit 80 of our personnel fulltime to this effort. This represents at least 10% of our “technical” work force. Furthermore, if the 30-day period is based on “calendar days” the required personnel increases as our technical employees are not expected to work over weekends. Calendar days would increase the required fulltime personnel to 110 employees; adding holidays would increase the employee count again. Furthermore, this segment of our workforce is vital to our operations and could not be dedicated full time to this task to the detriment of their regular responsibilities.

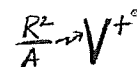
SWN has reviewed the Part 1 survey form and believes that we have the information necessary to complete the significant majority of the draft Part 1 survey. However, that information is not readily available in a singular data base or asset tracking system. Furthermore the Part 1 survey form is pre-populated with “drop down” selections. While we believe the intent of the “drop down” selections was/is to minimize resource impacts, it can actually have an adverse effect due to the manual line by line entry which will be required. With the various SWN personnel needed to locate, aggregate, compile and individually enter the data into the Part 1 survey for approximately 2,500 well pads, we believe the resource impacts could easily be doubled (e.g. 38,000+ hours, 160 full time technical staff, > 20% of our technical workforce).

Part 2 ICR Survey Timelines and Resource Estimates

We recommend that EPA extends a more reasonable reporting timeline for the Part 2 surveys which will allow operators adequate time to compile and report better factual and more accurate data.

The more detailed Part 2 surveys would be due within 120-days of request. EPA has estimated approximately 33 hours per facility to complete the Part 2 survey. Because the “population” or number of “facilities” that will be subject to Part 2 survey is “unknown” it is impractical to conduct a resource estimate similar to the Part 1 survey. However, unlike the Part 1 survey, the Part 2 survey requires a significant amount of information which a company may not have and for which considerable time and expense will be required to obtain. As an example, the Part 2 survey requires a detailed count of “components” (e.g. valves, flanges, connectors, PRVs, etc) as well as categorized by major equipment type (e.g. wellhead, separator, compressor, tanks, etc). In addition, Part 2 requires sampling of liquids at sources which may not be equipped for such sampling. Therefore facility “modifications” may be required to facilitate such sampling. These “modifications” may require engineering review, design and approval. Additional time would be required to make the necessary modifications and obtain the sample. These are a couple of examples of Part 2 survey elements which may significantly impact the resources needed to complete the survey.

As expressed above, SWN supports the acquisition of factual data to assist in the evaluation of impacts from proposed regulation for oil and gas existing sources. We find the ICR in its proposed form to be overly burdensome and the resource assessments and timelines (30-days/120-days) to be unreasonable. We recommend that the agency consider streamlining both the Part 1 and Part 2 surveys and utilize information that is already publically available (e.g. 40 CFR Part 98 Greenhouse Gas Inventory Rule



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Reporting). We also recommend that the agency extends the submittal deadlines to at least 180-days for Part 1 surveys and 180-days for Part 2 surveys.

We appreciate the opportunity to provide these comments and would be glad to meet with you to discuss our comments. If you have questions please contact me Doug Jordan at douglas_jordan@swm.com or 832-796-7628 or Roy Hartstein at roy_hartstein@swm.com or 832-796-4875.

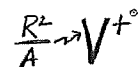
Sincerely,

Ex. 6 - Personal Privacy

Douglas Jordan

Director Corporate Environmental Programs

V+ Resource Development



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